

GOVERNMENT OF THE DISTRICT OF COLUMBIA
ADVISORY NEIGHBORHOOD COMMISSION 3B
GLOVER PARK AND CATHEDRAL HEIGHTS



February 13, 2020

Mr. Andrew Trueblood
Director, Office of Planning
1100 4th Street SW, Suite E650
Washington, DC. 20024

Dear Mr. Trueblood:

Thank you for the opportunity for ANCs to comment on the draft amended DC Comprehensive Plan (“Comp Plan.” The Comp Plan is very important as a framework and guidebook for all planning in the District, including for housing, transportation, schools, parks and other public facilities, as well as development and zoning decisions in the District. We appreciate the addition of provisions on resilience and climate change. Many of the other elements can also have major effects on our area and the city.

As our ANC expressed in our December 12, 2019, letter to OP, we would have liked to see OP undertake extensive and comprehensive outreach to residents and other stakeholders as part of the Comp Plan amendment process, including full presentation of the proposed amendments to the Comp Plan, what they are intended to do, and how they address strengths and weaknesses that have been identified in the 2006 Comp Plan as part of a formal evaluation process. In the absence of that kind of effort, and with a very constrained time schedule, our Commission has reviewed the content of the draft amended Area Element for Rock Creek West, which is the part of the District that includes ANC3B, and tried to assess whether the amendments reflect what we know about our own community and what our constituents are seeking as we look to the future.

We would also like to share some more general points about priorities for the area and the city including:

- supporting and preserving stable neighborhoods so they can provide a high quality of life for new and existing residents;
- emphasizing the importance of preserving and enhancing the tree canopy and avoiding or reducing “heat islands” in all plans for land use and other economic development;
- carrying out environmental goals adopted in the Clean Energy DC legislation last year, including energy conservation, reduced use of fossil fuels, and increased use of renewable energy, which should be built into plans for economic development, construction and renovation, and other land use plans and design decisions
- creating and preserving affordable housing and moderate cost housing in the area, to ensure that housing options are available in our area for residents at all income levels rather than just high cost or luxury housing, whether in new or existing buildings;
- supporting mixed use including retail and other commercial as well as residential use in neighborhood commercial districts along major transit corridors;

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- planning for additional school capacity along with plans for additional housing for families in the area;
- ensuring that plans for other development are coordinated with plans for transportation and other infrastructure to ensure that adequate services are available for new and existing residents;
- providing housing options such as permanent supported housing in the Rock Creek West area for individuals assessed with ongoing needs for medical and mental health care and other social services, to ensure that their current services continue when they move and they are not left without required assistance in units that do not sustain their quality of life;
- providing for public participation in reviewing and commenting on future changes to the Comp Plan as well as plans for developments that use city funding or require zoning approval.

These types of points about priorities would usually be included in a section of the Comp Plan entitled "Priorities." OP, however, did not conduct a comprehensive outreach process to identify the people's vision and priorities for the city, the functional areas covered in the plan, or various part of the city, that means there is no section of the draft plan presenting a new vision or priorities for our area, Rock Creek West. That section of the 2006 plan is simply omitted from the Area Element and placed in an appendix. For that reason, we have tried to represent priorities that have been raised to our ANC and will offer them on several key topic areas in the draft, with the hope they will be useful as guidance for this and future drafts of the Comp Plan.

As many residents, planners, business people, and local officials have observed, the District has changed a great deal since 2006, in ways that are visible and tangible in how the city and its neighborhoods look and operate and in other ways that are unseen but felt. Some challenges remain the same, others have evolved, and many new challenges have emerged. Our expectation and recommendation is that when OP next takes up the Comp Plan for amendments or rewrites, the process should begin with wide-ranging outreach that reaches a large share of residents and other stakeholders around the District, with the intention of understanding the people's vision and priorities. It should also consider what has worked well and what has not worked as well in the Comp Plan in the intervening years. That combination of listening and learning and evaluating, against a backdrop of standards and principles that reflects a range of views and interests of the public, can create a foundation for considering what portions of the Comp Plan should be amended or rewritten and what changes are needed to satisfy the overarching vision of the people for their city.

We are attaching recommendations for specific provisions of the draft amended Comp Plan in the Area Element for Rock Creek West which covers our ANC area, and corresponding mark-ups with specific suggestions and questions. Our recommendations focus on maintaining stable, attractive neighborhoods, supporting the vitality of the local business district, protecting and expanding the tree canopy, conserving National Park land and the U.S. Naval Observatory, considering school capacity and overcrowding in plans for housing and other development, completing sewer improvements including in Glover Archbold Park, supporting housing for seniors and people with disabilities, and providing senior wellness activities through decentralized programming at facilities around the Rock Creek West area. Also attached are some additional general priorities for other Elements of the amended draft Comp Plan on Housing, Environment, and Land Use.

As ANC3B has highlighted in our previous comments to OP about other phases of this Comp Plan cycle, public participation is essential to effective city planning at each stage, from development of the vision and priorities all the District's plans to the specific language of the Comp Plan to Small Area Plans, plans for other agencies and parts of the infrastructure, and zoning regulations, to the review of particular projects such as PUDs or applications that go through the Board of Zoning Adjustment.

Though public participation was not as full as the city should have provided and as we would have liked to see through the current amendment cycle, from 2017 to 2019, we hope that OP will fully consider all comments from ANCs and members of the public in this comment period, before finalizing the draft amended Comp Plan and moving it forward to the Council for review.

We hope that in coming years, OP will concentrate on designing an effective process for reaching out to the people throughout the District to hear their priorities and assess their vision for the future, consider what worked well or not as well all under the 2006 Comp Plan and the 2019 rewrite, and assess the changes recommended to correct or improve the Comp Plan, as the foundation for the actual update of the Comp Plan that is due to be completed in 2026.

We also would like to share a few recommendations for future updates of the Comp Plan. Though the calendar established by the Council currently in effect required a set of amendments to the 2006 Comp Plan in 2011, 2016, and 2021 leading to a complete update/rewrite in 2026 after 20 years, it is now 2020 and it may take an entire year or more for the Council to approve the amendments in the current cycle, so it is in no way practical to imagine that we could undertake another amendment cycle that would conclude in 2021. Our strong recommendation would be to skip the 2021 amendment cycle—or consider the current cycle to satisfy that requirement—and move directly to working toward having an effective, inclusive updated Comprehensive Plan in place by 2026, with all the public outreach, public input, and public review that would be required in a full public planning process that there was not time to do in this amendment process.

If the Council finds it necessary or desirable to adopt new legislation to guide the Comp Plan update process for 2026, we suggest that there should be:

- requirements for formal evaluation of experiences with what works and what does not work as well in the Comp Plan in effect, with public outreach, public comments, and public sharing of the evaluation results before initiating a call for amendments or input for an update or rewrite of the Comp Plan
- detail on what should be considered in the range of “amendments” in an amendment cycle
- directions on how to elicit suggested amendments from a broad range of stakeholders, identify the reasons for the proposed amendments and the intended effects
- provisions for stakeholders to submit suggestions of provisions in the Comp Plan that they would like to keep, rather than change
- specifics on the timetable and notification process and potentially public hearings that OP should follow to provide for public review of proposed amendments, including adequate information and time for residents and ANCs to make an assessment and submit comments
- consideration of a shorter time between full updates of the Comprehensive Plan, perhaps 15 years with two amendment cycles rather than 20 years with three amendment cycles.

Thank you for your consideration.

Sincerely,



Brian Turmail
Chairman

This letter was approved by a vote of 5-0 at a duly noticed public meeting of the Commission on February 13, 2020, at which a quorum was present. (Three of the five Commissioners make a quorum.) By that vote, the Commission also designated the Chairman or the Commissioner for 3Bolt to represent the Commission on this matter.

Attachments:

Other Points on ANC3B Priorities in Select Elements

Detailed Recommendations for Area Element Rock Creek West

Mark-up of Area Element Rock Creek West

Zoning Description for Mixed Use (MU) Zone MU-27 Naval Observatory

Residents' Comments on Draft Amended Comp Plan

Draft Amendments

2300 OVERVIEW

2300.1 The Rock Creek West Planning Area encompasses 13 square miles in the northwest quadrant of the District of Columbia. The Planning Area is bounded by Rock Creek on the east, Maryland on the north/west, and the Potomac River and Whitehaven Parkway on the south. Its boundaries are shown in the Map at left. Most of this area has historically been Ward 3 although in past and present times, parts have been included in Wards 1, 2, and 4. 2300.1

2300.2 Rock Creek West's most outstanding characteristic is its stable, attractive neighborhoods. These include predominantly single-family neighborhoods such as like Spring Valley, Forest Hills, American University Park, and Palisades; row house and garden apartment neighborhoods ~~like~~ such as Glover Park and McLean Gardens; and mixed density neighborhoods such as Woodley Park, Chevy Chase, and Cleveland Park. ~~Although these communities retain individual and distinctive identities, they share a commitment to proactively addressing land use and development issues and conserving neighborhood quality.~~ 2300.2

2300.3 Some of Washington, DC's ~~the District's~~ most important natural and cultural resources are located in Rock Creek West. These resources include Rock Creek Park, the National Zoo, Glover Archbold Park, Battery Kemble Park, and Fort Reno Park as well as numerous smaller parks and playgrounds. Many of these areas serve as resources for the entire city. Cultural resources include the Washington National Cathedral, American University, the University of the District of Columbia, Howard Law School George Washington University's Mt. Vernon Campus; numerous places of worship ~~churches~~; and several museums, including the Kreeger and Hillwood. The neighborhoods themselves are an important cultural resource, with many historic landmarks and several historic districts ~~and many historic landmarks~~ such as Cleveland Park, Grant Road, and the Immaculate Seminary. Rock Creek West is also the location of the Naval Observatory and the home of the U.S. Vice President. 2300.3

2300.4 Despite its residential character, Rock Creek West is also home to a diversity of employment centers, including public and private educational and cultural institutions, ~~actually has more jobs than households. The community is host to major corporations such as Fannie Mae and Intelsat, and three of the region's commercial television stations~~ local broadcasters, ~~It includes~~ and a large number of foreign missions, including the International Chancery Complex at Van Ness Street. Several large hotels are located in the community, including the Omni-Shoreham and Marriott Wardman Park near the Woodley Park Metro station. 2300.4

2300.5 ~~Some of the District's most v~~ Vibrant retail districts are located around the area's Metro stations and along its major corridors. ~~Commercial overlay~~ Special zones

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have been created in three of these areas, allowing a mix of retail uses and retaining a human scale and pedestrian character along neighborhood shopping streets. Much of the commercial land use in the area is located along the Wisconsin and Connecticut Avenue corridors in shopping districts like Friendship Heights, Tenleytown, Van Ness, and Cleveland Park. ~~While the presence of these uses is generally positive and creates some of the most livable neighborhoods in the city, the downside is that major~~ With services and retail serving both the neighborhood and broader region, these mixed-use corridors are commuter thoroughfares that are often congested, minimizing pedestrian safety and comfort and residential side streets are burdened with parking problems. 2300.5

creating challenges for local businesses and residents, including access environmental quality and

NEW

have the benefits of local features and assets such as

Since the early 2000s, as many neighborhoods across Washington, DC have seen reinvestment and population growth, commercial corridors in Rock Creek West have experienced competition for customers and for new restaurants and retailers. Although Rock Creek West's commercial corridors can still rely on local assets like proximity to busy transit stations, affluent neighborhoods, and well-travelled roadways, some of the Rock Creek West commercial corridors have struggled with retaining businesses and competing successfully with other rapidly-growing and popular corridors both within Washington, DC, and Montgomery County, Maryland. Some commercial strips experiencing challenges in attracting new retailers or customers have relied largely on restaurants to fill out storefronts. Recent mixed-use developments such as Park Van Ness and Cathedral Commons have helped to add new retail and restaurant choices as well as housing and new patrons for local businesses to major corridors such as Connecticut and Wisconsin Avenues. Additionally, new Main Street organizations in Tenleytown and Van Ness are working to help attract desired retailers and enliven and improve the public realm. commercial areas

minimized cannot possibly be the appropriate word here

routes and

and northern Virginia

Woodley Park and Glover Park

2300.6

The Rock Creek West area has strong significant economic momentum potential, leading to past and present concerns about the effects community impacts of unrestrained development on traffic, public services, and quality of life. This creates a different dynamic than is present in many District neighborhoods, and reduces the need for government programs to stimulate private investment. The combination of a relatively affluent population, excellent transportation options (including five Metro stations with some of the system's highest non-CBD ridership levels), stable and attractive neighborhoods, high-quality retail, and a limited supply of vacant land, has led to very strong market demand. This in turn has led to an emphasis on growth control rather than growth incentives. The need desire to thoughtfully appropriately control and guide growth, and to protect preserve neighborhoods, remains a top priority throughout the community and is a major theme of this Element. 2300.6

Taking out any examples of impacts leaves this sentence very unclear. What impact

Demand for what? property? developable land? real estate?

A "desire" is not a priority. Could you say: Preserving neighborhoods and thoughtfully guiding growth remain top priorities. 2300.7

The demand for housing also has been remains consistently strong in Rock Creek West. During the 1980s and 1990s, when Washington, DC the District was

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losing residents, neighborhoods west of Rock Creek Park continued to add households. Growth has resulted from a combination of factors, including relatively low crime rates, numerous neighborhood amenities, accessible neighborhood retail, convenient Metrorail access, active community organizations, ~~and~~ relatively high-performing public schools with strong parental support, and numerous private schools. 2300.7

2300.8

These same factors have created a continuing affordable housing dilemma in the community. The 2016 median sale price for homes in ZIP codes west of Rock Creek Park exceeded \$975,000. ~~In 2005, the median purchase price of a home exceeded \$800,000 in every zip code west of the Park. Tax assessments have escalated as home prices have increased, placing a burden on many residents—especially seniors and those with low and moderate incomes. Rents have also escalated, and the overall supply of rental units has decreased as apartments have converted to condominiums.~~ Although there are ~~limited~~ opportunities for new housing development in the area, there continues to be a substantial unmet need for new affordable units and a need to preserve existing ~~protect the remaining~~ affordable and moderate income units ~~in an environment where affordable units are being eliminated.~~ Increasing the production of affordable and moderate income units in Rock Creek West is a priority. 2300.8

NEW

Washington, DC has a strong need to preserve and create affordable and moderate income housing across all Planning Areas. Rock Creek West offers opportunities for creating low to middle-income housing units, particularly where available capacity exists under current zoning, including near Metro stations. As an Area of High Economic Opportunity, as defined by the Department of Housing and Urban Development, Rock Creek West has a role to play both in preserving its existing stock of affordable housing while ~~providing new mixed income housing to meet the Washington, DC's fair housing goals.~~ *and*

2300.9

The preservation and improvement of the natural environment is also a high priority in Rock Creek West. The community is fortunate to have one of the densest tree canopies in the city, several community gardens, the Capital Crescent Trail, and more park and open space acreage than any other Planning Area in the city. However, development on the fringes of the ~~single-family homes in North Cleveland Park~~ parks has caused erosion and diminished water quality and views in some places. The existing T-tree and slope overlay zones have been created in several locations to address this issue ~~protections in the zoning code need to be preserved for the foreseeable future.~~ 2300.9

2300.10

The sense of community in Rock Creek West is reinforced by a particularly active network of neighborhood associations, Advisory Neighborhood Commissions, and involved residents. Well-organized Citizens Associations serve many of the area's neighborhoods, including AU Park, Chevy Chase, Cleveland Park, Forest

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Hills, Foxhall, Glover Park, Palisades, Spring Valley, Wesley Heights, Tenleytown, and Woodley Park. A number of Historical Societies and interest groups are also actively involved in community affairs. Main Street organizations have been established for Van Ness and Tenleytown. These groups shape local land use and development decisions, and provide guidance on a wide range of issues relating to transportation, community services, public safety, and other long-range planning concerns. 2300.10

and in 2019,
Woodley Park
and Glover Park

can help

2301 HISTORY

2301.1 The first settlements in Rock Creek West developed along roads connecting the port of Georgetown to the countryside north and west of the city. One of the first settlements was at the juncture of Georgetown Pike (now Wisconsin Avenue) and River Road, where there was a toll station. John Tennally opened a tavern at the intersection around 1790, giving his name to the area now called Tenleytown. Several large estates were developed in the area during the 1800s, including the estate of Colonel Joseph Belt (named Chevy Chase), Major John Adlum's 200-acre "vineyard" in what is now North Cleveland Park, and the Henry Foxhall estate in modern-day Foxhall. 2301.1

2301.2 The C&O Canal was completed in 1843, and a parallel road (now MacArthur Boulevard) was constructed to the city's water intake facilities at Great Falls. The canal prompted industrial development along the Potomac River and in the Palisades, including a foundry and several slaughterhouses along Canal and Foxhall Roads. The Rock Creek West area developed strategic military importance during the Civil War, when Fort Reno, Fort DeRussy, Fort Bayard, Battery Kemble, and other fortifications were developed. 2301.2

2301.3 The area remained rural after the Civil War. The Potomac Palisades became popular as a summer retreat for wealthy Washingtonians. Land adjacent to Fort Reno, meanwhile, was occupied by people who had been enslaved ~~former slaves~~ who came north in search of homes and land. Their community, dubbed "Reno City," remained until the 1930s when the District developed Deal and Wilson ~~S~~schools, and the National Park Service developed Fort Reno Reservoir. Another community of persons freed from slavery ~~slaves~~ developed along Chain Bridge Road in the Palisades. 2301.3

2301.4 Development in the Rock Creek West area began in earnest around 1890. In that year, Senators William Stewart and Francis Newlands founded the Chevy Chase Land Company. The company was responsible for the extension of Connecticut Avenue into Maryland, construction of a trolley line, and the development of the residential community of Chevy Chase. Also in 1890, Congress dedicated 1,700 acres along the Rock Creek Valley as Rock Creek Park-defining development, transportation, and demographic patterns that would shape the city during the century to come. Other defining moments of the era included the groundbreaking

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~~the commercial corridors, and accepting small community residence facilities within single family neighborhoods.~~

- m. ~~Institutional uses, including private schools, non-profits, large nursing homes, colleges, hospitals, and religious establishments, are part of the fabric of the Rock Creek West community. In fact, they comprise almost 660 acres in the Planning Area, almost one-third of the citywide total. Local institutions provide a resource for local families, and include some of the most architecturally distinctive buildings and attractive settings in the community. Yet many of these facilities have structures that do not conform to the underlying zoning. In some instances, tensions have arisen between institutions and surrounding neighbors due to noise, parking, traffic, and other issues. Pursuant to the District's zoning regulations, the compatibility of these uses must be maintained, their expansion carefully controlled, and conversion to other non-conforming uses avoided. Solutions to traffic, parking, and other issues must continue to be developed so that the quality of life in surrounding neighborhoods is not diminished.~~

2308 RCW-1 GENERAL POLICIES

2308.1 RCW-1.1 Guiding Growth and Neighborhood Conservation

The following general policies and actions should guide growth and neighborhood conservation decisions in Rock Creek West. These policies and actions should be considered in tandem with those in the citywide elements of the Comprehensive Plan. 2308.1

2308.2 *Policy RCW-1.1.1: Neighborhood Conservation*

~~Protect-Preserve~~ the low density, stable residential neighborhoods west of Rock Creek Park ~~and recognize the contribution they make to the character, economy, and fiscal stability of the District of Columbia.~~ Future development in both residential and commercial areas must be carefully managed to address ~~infrastructure constraints and protect and enhance~~ the existing scale, function, and character of these neighborhoods Updates to the Zoning Regulations offer the opportunity to create more accessory dwelling units for this area to help absorb a share of the District's growth and provide a more proportional share of affordable and moderate income housing sensitive to existing neighborhood context. 2308.2

Does this word have a legal meaning, such as 'consider' or 'take into account'?

2308.3 *Policy RCW-1.1.2: Economic Development*

Given the strength of the private market within Rock Creek West, carefully consider public-private partnerships ~~sector initiatives~~ that provide public space and community amenities and support ~~would stimulate~~ additional mixed-use development in the area. 2308.3

(spaces?)

2308.4

Policy RCW-1.1.3: Conserving Neighborhood Commercial Centers

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Support and sustain local retail uses and small businesses in the area's neighborhood commercial centers as outlined in the Generalized Policy Map. ~~These centers should be protected from encroachment by large office buildings and other non-neighborhood-serving uses.~~ Compatible new uses such as multi-family housing or ~~limited low-cost~~ neighborhood-serving office space (above local-serving ground-floor retail uses) should be considered within the area's commercial centers to meet affordable and moderate income housing needs, provide transit-oriented development, and sustain existing and new neighborhood-serving retail and small businesses, ~~and bring families back to the District.~~ 2308.4

2308.5

Policy RCW-1.1.4: Infill Development

Recognize the opportunity for infill development within the areas designated for commercial land use on the Future Land Use Map. When such development is proposed, work with ANCs, residents, and community organizations to encourage mixed-use projects that combine housing, including affordable housing, neighborhood-serving retail, and commercial uses, ~~rather than projects that contain single uses.~~ Heights and densities for such development should be appropriate to the scale and character of Neighborhood retail along Connecticut Avenue adjoining communities. Buffers should be adequate to protect existing residential areas from noise, odors, shadows, and other impacts. Design transitions between large-scale and small-scale development to ameliorate the appearance of overwhelming scale and to relate to context of lower scale surrounding neighborhoods. 2308.5

Policy RCW-1.1.5: Preference for Local-Serving Retail

Support new commercial development in the Planning Area that provides the range of goods and services necessary to meet the needs of local residents. Such uses are preferable to the development of new larger-scale or "big-box" retail uses that serve a regional market. "Destination" retail uses are not appropriate in smaller-scale commercial areas, especially those without Metrorail access. Regardless of scale, retail development must be planned and designed to mitigate traffic, parking, and other impacts on adjacent residential areas. 2308.6

2308.7

Policy RCW-1.1.6: Metro Station Areas

Recognize the importance of the area's five Metrorail stations to the land use pattern and transportation network of Northwest Washington and Washington, DC as a whole ~~the entire District of Columbia~~. Each station should be treated as a unique place and an integral part of the neighborhood around it. ~~The Mixed-use redevelopment of large office buildings at the area's M metro stations should be discouraged. The preference is to use available and underutilized sites for~~ prioritize the production of affordable and moderate income housing and retail uses in a manner consistent with the Future Land Use Map, the Generalized Policies Policy Map, and the policies of the Comprehensive Plan. Careful

How about: Design transitions from development along the avenues to nearby low-scale neighborhoods in a way that is sensitive to the context and aesthetically pleasing

Comprehensive Plan Rock Creek West Area Element

October 2019

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More than what?

This sentence order is confusing and not clear.

~~transitions~~ **Design context-specific transitions to be more aesthetically pleasing** from development along the avenues to nearby low-scale neighborhoods **must be provided.** 2308.7

X

2308.8

Policy RCW-1.1.7: Housing for Seniors and Disabled Residents

with disabilities

Maintain and increase housing for elderly and disabled residents, especially along the major transportation and commercial corridors of Wisconsin and Connecticut Avenues. 2308.8

X

2308.9

Policy RCW-1.1.8: Managing Institutional Land Uses

Manage institutional land uses in the Rock Creek West Planning Area **should be in a way that ensures that their operations are** harmonious with surrounding uses, **and that expansion is carefully controlled, and that** potential adverse effects on neighboring properties **should be** are minimized **when institutions seek expansion.** **Ensure that any** redevelopment of institutional land **should be** is compatible with the physical character of the community, **changing nature of the city,** and **is not in** inconsistent with **all** provisions of the Comprehensive Plan and the underlying zoning rules and regulations. Densities and intensities of any future development on such sites should reflect **surrounding land uses, as well as infrastructure constraints and** input from the local community, **accommodating student housing on campuses and future infrastructure needs.** 2308.9

and the

See the Land Use Element for policies on the expansion of institutional uses and the neighborhood impacts of private schools and other institutional uses.

2308.10

Policy RCW-1.1.9: Protecting Common Open Space

Protect the large areas of green space and interior open spaces that are common in and around the community's institutional uses and its older apartment buildings, such as Cathedral Mansions and the Broadmoor. Where these open spaces are recognized to contribute to the integrity of the site or structure, **consideration must be given to reconcile infill with these open spaces** **stringent protection from inappropriate infill shall be maintained.** 2308.10

and character of the community

2308.11

Policy RCW-1.1.10: Conservation of Historic Estates

Conserve the historic estates in the neighborhoods west of Rock Creek Park, including those that are formally landmarked and those that may be eligible for landmark status. Require that the future use of these sites is compatible with their landmark status and protects the integrity of their architectural and landscape design. **In the event** As development **and repurposing of these sites** does occur, it must be sensitive to surrounding natural areas **and adjacent low density residential uses,** and not harm historic resources on the site. The use of conservation easements to protect open space on these properties should be considered. 2308.11

Q: What does this phrase mean? Physical, economic, social context? The phrase is much too loose.

This seems to assume infill should and will occur. How about?

any infill development must be planned with consideration of the character and value of these open spaces.

How about "where" or "when"

Do not eliminate consideration of adjacent or surrounding uses →

This paragraph starts out to be directed at the city as a whole, and the city government as the actor "developing" and "ensuring". The new language calls for encouraging developments to provide transportation options and implement traffic calming. Is that the intent/expectation?

Comprehensive Plan Rock Creek West Area Element

October 2019

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Many traffic calming efforts involve measures taken in public space that is not within the authority of a private "development."

Recommend leaving the wording "and reduce" 2308.12

TDM has multiple objectives, not just reducing the total volume of vehicle trips generated.

The word "multimodal" has several meanings and is not clear here. Could you say "provide options for using a range of transportation options?" 2308.13

Do you want to refer to non-motorized, or non-automobile?

See comment above. "Multimodal" is transport jargon that has evolved to have several meanings. In this sentence, couldn't you just say "multiple" since the sentence lists several different modes.

What does this mean: Zipcar (2006), Uber (2017), ride-sharing, car-wire, autonomous vehicles when available?

Policy RCW-1.1.11: Managing Transportation Demand

Improve traffic service levels on the area's thoroughfares by Developing transportation systems management programs, Support the implementation of transportation demand management programs, and other measures to more efficiently use the area's road network and by reducing the volume of vehicle trips generated by new developments. Ensure that Encourage new developments to provide multimodal transportation options and implement does not unreasonably degrade traffic conditions, and that traffic calming measures are required to reduce development impacts on surrounding neighborhoods. This policy is essential to protect and improve the quality of life and the residential character of the area. 2308.12

Policy RCW-1.1.12: Congestion Management Measures Reduce Single Occupancy Vehicle Trips

~~Ensure that land use decisions do not exacerbate congestion and parking problems~~ Encourage land use decisions that support multimodal transportation options including walking, biking, and transit use in already congested areas such as the Friendship Heights, Tenleytown, and Connecticut/Van Ness Metro stations to reduce single occupancy vehicle trips. When planned unit developments are proposed in these areas, require traffic studies which identify the site design and mitigation measures should prioritize non-automobile modes, that must occur to maintain acceptable transportation service levels and secure a commitment to implement these measures through transportation management plans. Traffic studies and mitigation plans should consider not only the impacts of the project under consideration but the cumulative impact of other projects which also may impact the community, as well as the impact of non-resident drivers using local streets. Pedestrian and bicycle facilities, enhanced transit stops, and car-sharing services, bicycle facilities, and designs which promote transit use should be integrated into site designs encouraged as mitigation measures, in addition to measures addressing passenger, delivery, and service vehicles. 2308.13

Would it be more effective to apply this sentence to the whole area, and/or all arterials? The second sentence could refer to the Metro stations

What does this mean: better, more, bigger, more attractive?

"facilities that promote and facilitate transit use" seems preferable

Please consult the Transportation Element of the Comprehensive Plan for policies on traffic levels of service and transportation demand management programs. ~~Ensure that land use decisions do not exacerbate congestion and parking problems in already congested areas such as the Friendship Heights, Tenleytown, and Connecticut/Van Ness Metro stations.~~

2308.14

Policy RCW-1.1.13: Parking

~~Consider the use of easements with private developers~~ Support parking management strategies to encourage multi-modal ~~provide additional public parking options for accessing~~ in the area's residential and commercial districts. ~~On-street public parking should not be removed within these districts.~~ 2308.14

"Multi-modal" is a different spelling from above.

Could you say "multiple modal"?

2308.15

Policy RCW-1.1.14: Bicycle Facilities

Definitions of multimodal transportation: involving use of more than one mode to make a single trip; or involving availability of more than one modal option for making a trip and/or meeting a specific demand for travel

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recommendations in DDOT Livability Studies
Implement MoveDC and livability studies to improve facilities for bicyclists, **including bike lanes and bikeshare stations, where feasible, to the extent** ~~feasible and consistent with traffic safety considerations~~, along Connecticut, Wisconsin, and Massachusetts Avenues, along MacArthur Boulevard, along Calvert **and Abermarle Streets, Broad Branch Road** (to Rock Creek Park), and at each of the Metrorail stations. 2308.15

2308.16 **Policy RCW-1.1.15: Metrorail Access**
~~Ensure~~ **Prioritize** pedestrian, bicycle, and bus access to the five Metro Station areas, and improve their visual and urban design qualities. Space for car-share **and rideshare** vehicles should be provided near the stations where feasible to reduce parking congestion in neighborhoods and encourage ~~car-sharing as an~~ alternatives to vehicle ownership. 2308.16

2308.17 **Action RCW-1.1.A: Commercial Zoning Assessment**
 Conduct an evaluation of commercial zoning designations throughout the Rock Creek West Planning Area. Consider the creation of additional neighborhood commercial ~~overlay~~ zones at the Van Ness/UDC, Tenleytown, and Friendship Heights Metro stations, and at neighborhood commercial centers and “main streets” throughout the area. Such ~~overlays~~ **zones** should **promote pedestrian-oriented** ~~ensure that new~~ development ~~is pedestrian-oriented, achieves neighborhood compatibility, and is~~ **be** responsive to community concerns about building height, buffers, and transitions between uses, **while promoting locally-owned businesses and mixed-use development**. 2308.17

2308.18 **Action RCW-1.1.B: Protection of Neighborhood Architecture and Aesthetics**
Implementation?
 Consider new tools such as Conservation Districts and changes to the Zoning Regulations to reduce the incidence of “teardowns” in Rock Creek West’s single family and row house neighborhoods. While this is a citywide issue (see Policy LU-2.1.6 and Action LU-2.1.D), it is a particular concern in this part of the city. **Completed-See Implementation Element** 2308.18

(Is this provision being retained?)

2308.19 **Action RCW-1.1.C: Joint Planning Agreement with Montgomery County**
~~Develop a joint planning agreement with the Maryland National Capital Park and Planning Commission/Montgomery County to coordinate the mutual review of projects and area plans on both sides of the District/ Maryland line. Obsolete-See Implementation Element~~ 2308.19

2308.20 **Action RCW-1.1.D: Traffic Flow Improvements**
 Conduct and **implement** ~~regularly update~~ transportation **and livability** studies for the area’s major corridors to identify possible traffic flow and safety improvements. These studies should also identify improvements to diminish “cut-

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- f. Neighborhoods developed on hilly terrain on or near stream valleys such as **Chain Bridge Road / University Terrace**, Barnaby Woods, Forest Hills, Hawthorne, Spring Valley, and Woodland-Normanstone; and
- g. The Fort Circle Parks, including **Battery Kemble Park**, Fort Bayard Park, and Whitehaven Parkway. 2309.2

~~The Norman-style water tower at Fort Reno is located near Tenley Hill, highest point in the District of Columbia.~~

- 2309.3 Any future development adjacent to these areas must be designed to respect and maintain their park like settings, and conserve their environmental quality. 2309.3

- 2309.4 ***Policy RCW-1.2.3: National Park Service Areas***
Conserve and improve the more than 2,000 acres of natural open space in the forested neighborhoods that lie between the Potomac River and Rock Creek Park, including Battery Kemble Park, Glover Archbold Park, the Potomac National Heritage Scenic Area, and the Fort Circle Parks. Support efforts to restore water quality and improve natural habitat, along with capital improvements to improve trails and provide appropriate recreational features. 2309.4

- 2309.5 ***Policy RCW-1.2.4: Cultural and Tourist Attractions***
Protect and enhance the cultural and visitor attractions west of Rock Creek Park, including the National Cathedral, the C&O Canal, the Capital Crescent Trail, Peirce Mill, the Hillwood Estate, and the National Zoo. Encourage broader recognition of other attractions in the area, such as the Naval Observatory and the Fort Circle Parks. Ensure that tourist activity ~~does not disrupt the~~ **can blend** positively with quality of life for nearby residents. ~~by requiring strict adherence to~~ **Implement and maintain** traffic routing, transportation and parking management plans, and reasonable visitation hours. 2309.5

- 2309.6 ***Policy RCW-1.2.5: Historic Resources***
Conserve the important historic resources of the neighborhoods west of Rock Creek **that are identified in the DC Inventory of Historic Sites**, ~~including but not limited to the Glover, Taft, and Ellington bridges; the Washington National Cathedral; mansions such as the Tregaron, Twin Oaks, Cloverdale, and Rosedale Estates, and the Babcock Macomb House, the Rest, and Owl's Nest; the Pine Crest/Greystone/Klingbe Mansion cluster of houses near Rock Creek; the historic districts such as Cleveland Park, Woodley Park, and Grant Road; historic apartment buildings such as the Kennedy Warren, Cathedral Mansions, the Ponce de Leon, 3901 Connecticut, and Alban Towers; the Chevy Chase arcade and Avalon and Uptown Theaters; the Spring Valley Shopping Center; and the sites of significance inventoried in the Historic Resources Survey conducted by~~ **the DC Historic Preservation Office**, the Tenleytown Historical Society, and the

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National Park ~~Service System~~. Where more intense development is proposed in the vicinity of historic properties, adverse effects should be mitigated through careful siting, massing and design to respect the character of the historic property and to provide appropriate transitions between the historic property and surrounding areas. 2309.6

2309.7 ***Policy RCW-1.2.6: Naval Observatory***

Ensure that planning decisions in the vicinity of the Naval Observatory consider the possible effects of light pollution and take appropriate steps to avoid adverse impacts. 2309.7

2309.8 ***Policy RCW-1.2.7: Fire and EMS Services***

Renovate and enlarge fire stations while remaining sensitive to their historic architectural qualities. ~~and avoiding the loss of adjacent open space. Ensure that there are a sufficient~~ The number of fire stations must be sufficient to serve the needs of area residents and businesses. 2309.8

2309.9 ***Policy RCW-1.2.8: Schools and Libraries***

Place a very high priority on the expansion, renovation and improvement of schools and libraries. The fact that a majority of the schools in this Planning Area are operating at or above capacity should be considered in DCPS facility planning. ~~and in the approval of any residential development that could further exacerbate school overcrowding.~~ Changes to school service boundaries, ~~and the~~ expansion of existing school facilities, and/or development of additional school facilities should be aggressively pursued to ensure that school overcrowding is proactively addressed. 2309.9

2309.10 ***Policy RCW-1.2.9: Active Outdoor Recreation for All Ages ~~Centers and Aquatic Facilities~~***

Expand recreation grounds where and when feasible, with a particular emphasis on athletic fields for activities such as soccer, softball, and regulation baseball. A skate park, playgrounds and other outdoor spaces for children and teenagers are needed. ~~Expand aquatic facilities to a level of service that is comparable to the level provided in other parts of the District.~~ 2309.10

2309.11 ***Policy RCW-1.2.10: Community Based Residential Facilities***

Encourage the development of small-scale community-based residential facilities on scattered sites within the Planning Area, and social service counseling and referral facilities on the commercial corridors. Additional group homes and community based residential facilities should be accommodated. ~~provided that such facilities are consistent with the area's low-density character.~~ Local religious institutions should be encouraged to host small shelters to provide for persons experiencing homelessness the homeless, provide other needed social services or housing facilities, taking into consideration issues of liability, security, and adequacy of facilities. 2309.11

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See the Environmental Protection Element for additional policies on stream valley parks, limits on impervious surface coverage, expansion of the tree and slope protections in the zoning code overlay zone, urban forestry, air quality, aircraft noise, and development adjacent to parkland. See the Urban Design Element for policies on conserving natural landform and topography. See the Parks, Recreation, and Open Space Element for policies discouraging the placement of buildings on parkland. (Improvements to)

Action RCW-1.2.A: Combined Sewer Separation

Continue efforts to separate storm sewers and sanitary sewers within the area's stream valleys, with a priority on rehabilitating the combined sewer in Glover Archbold Park (conveying Foundry Branch). 2309.12

See the Infrastructure Element and Environmental Protection Element for more information on combined sewers.

Action RCW-1.2.B: Recreation Center and Pools

Develop a new recreation center and community pool in the eastern part of the Planning Area. An analysis conducted as part of the District's 2006 Parks and Recreation Master Plan determined a shortage of such facilities in the Tenleytown/North Cleveland Park/Forest Hills area and suggested that immediate planning begin to select appropriate sites. Completed-See Implementation Element 2309.13

Action RCW-1.2.C: Palisades Open Space Protection

Protect the historic linear open space that once supported the Palisades/Glen Echo trolley line, with its unique scenic vistas that it provides for public benefit. Consider rehabilitating the trestle bridges to accommodate a walk/bike trail. 2309.14

Action RCW-1.2.D: Senior Wellness Center Development

Develop an additional senior wellness center in the Rock Creek West Planning Area, partnering with existing facilities that serve all ages and community groups to provide decentralized programming, activities, and services to the area's large population of older adults in order to improve the delivery of services to the area's large elderly population. 2309.15

Action RCW-1.2.E: Tenley-Friendship Library

Complete the renovation/reconstruction of the Tenley-Friendship Library as a community gathering space and repository for books and media serving the surrounding community. Completed-See Implementation Element 2309.16

Action RCW-1.2.F: Façade Improvements

2309.12

2309.13

2309.14

2309.15

2309.16

2309.17

Draft Amendments

2311.1 From the Taft Bridge across Rock Creek, Connecticut Avenue extends 3.5 miles northwest to the Maryland State Line. Along the way, the avenue passes through the Woodley Park, Cleveland Park, and Van Ness/UDC commercial districts (with Metro stations of the same name at each location), as well as the Chevy Chase commercial district at its northern end. The avenue is a broad, attractive boulevard for most of its length, handling over ~~35,000~~ **30,000** vehicles on an average day. The areas between the commercial districts are generally developed with mid- to high-rise apartments and condominiums, although there are pockets of less dense development as well. ~~In many respects, Connecticut Avenue epitomizes the model of a "great street" that the city seeks to emulate in other parts of the District.~~ 2311.1

2311.2 Land use issues vary from one segment of the corridor to the next. The Woodley Park and Cleveland Park segments are historic districts and contain almost no undeveloped land. In Woodley Park, ~~two large hotels contribute to there are ongoing parking and traffic issues relating to the presence of two large hotels with a combined total of over 2,100 rooms. Proposals to convert rooms to condominiums and develop additional units at one of the hotels could generate the need for additional traffic and parking improvements during the coming years.~~ **Cleveland Park's historically healthy cluster of neighborhood serving retail and services has experienced challenges in recent years from limited nearby population growth and competition from other growing and revitalized commercial destinations. The Commercial Market Analysis and Enhancement Strategy for Cleveland Park completed in 2016 identified four opportunities to help Cleveland Park businesses adapt to the changing competitive context and attract additional customers:**

- a. grow and strengthen the Cleveland Park Business Association;**
- b. retain and expand Cleveland Park's customer base in its primary market area;**
- c. capture larger share of the existing vehicular and transit commuters along Connecticut Avenue; and**
- d. attract more visitors from other neighborhoods in DC and Maryland, and National Zoo visitors.** 2311.2

Why just mention effects on parking and traffic? The hotels contribute to tourism and business in the commercial area as well as open space.

NEW **While the corridor is largely built out, there remain opportunities for redevelopment and renovation to support the future vitality of commercial districts and create much needed affordable and moderate income housing. Retail strips along Connecticut Avenue could benefit from well-designed infill redevelopment or renovation and improved retail and service amenities.**

2311.3 ~~Further north, the Van Ness commercial district includes a multi-neighborhood shopping district (with a supermarket, several national retailers, and smaller businesses), office buildings, and several mid- to high-rise residential buildings. Intelsat and the International Chancery Complex are located here. The area also~~

Draft Amendments

~~includes the campus of the University of the District of Columbia (UDC), enrolling 6,000 students from across the city. 2311.3~~

2311.4 ~~While the Van Ness area functions as an important community shopping district, it suffers from a harsh street environment, an excessive amount of hardscaped surfaces, parking problems, a lack of distinctive facades and storefronts, a limited range of retail goods and services, and a loss of ground floor retail space to institutional and school uses. The area does not create the same welcoming appearance that is present in the older commercial districts to the south. The UDC plazas, in particular, could be redesigned to provide a more inviting civic space for students and area residents. 2311.4~~

2311.5 ~~Complementary uses such as public art, greenery, and additional local serving ground floor retail space could help make this center a more attractive gathering place. If and when private redevelopment of older commercial properties is proposed in the vicinity, every effort should be made to achieve more attractive architecture, and a mixing of residential and pedestrian-oriented retail uses rather than further concentration of office space and ground floor institutional/school space. 2311.5~~

2311.6 ~~A Campus Plan for UDC was completed in September 2005 to guide campus growth and development for the next 20 years. As the Plan is implemented, efforts should be made to improve the public space around the Metro station and ensure that any future facility development is compatible with the surrounding neighborhood. 2311.6~~

2311.7 ***Policy RCW-2.1.1: Connecticut Avenue Corridor***

Sustain the high quality of the Connecticut Avenue corridor. The positive qualities of the corridor, particularly its attractive older apartment buildings, green spaces, trees, and walkable neighborhood shopping districts, should be conserved and enhanced. Continued efforts to improve traffic flow and parking should be pursued, especially in the commercial districts. 2311.7

as well as safety and access for residents and visitors,

2311.8 ***Policy RCW-2.1.2: Infill Development***

Recognize the opportunity for additional housing, **including new affordable and moderate income units,** with some retail and limited office space along the Connecticut Avenue corridor. ~~Any development along the corridor should be consistent with the designations of these areas on the Future Land Use Map, zoning overlay requirements, and the scale of adjoining uses. 2311.8~~

NEW

Policy RCW: Cleveland Park Retail Enhancement

Support retail enhancement strategies for Cleveland Park to grow and strengthen the local business association, continue to attract and serve local residents, capture a larger share of the Connecticut Avenue commuters as business patrons, and attract more visitors from outside neighborhoods.

Draft Amendments

- 2311.9 ~~**Policy RCW-2.1.3: Van Ness/UDC Station Area**~~
~~Improve the design and appearance of the Van Ness/UDC Station area, particularly the "hardscaped" portion of the UDC Campus.~~ 2311.9
- 2311.10 ~~**Policy RCW-2.1.4: Coordination Between Community and UDC**~~
~~Support greater coordination and communication between UDC officials and the surrounding community on issues such as parking, traffic, property maintenance, and facility development. Establish complementary goals between the University and the community at large, so that the university becomes even more of a community asset and resource than it is today.~~ 2311.10
- 2311.11 ~~**Action RCW-2.1.A: Improving the UDC Plazas**~~
~~Work with UDC and with local community groups and the Advisory Neighborhood Commission in the "greening" of public open space on the UDC Campus.~~ 2311.11
- 2311.12 ~~**Action RCW-2.1.AB: Large Hotel Sites**~~
 Any ~~Carefully monitor~~ future proposals for the Omni-Shoreham and Marriott Wardman Park hotels should include analysis of impacts on adjacent residential and commercial areas, prepared by property owners, to ensure compliance with the Zone regulations and prevent adverse effects on the adjacent residential community. Proactively address ongoing issues at the hotels, such as tour bus and visitor parking. 2311.12
- 2312 **RCW-2.2 WISCONSIN AVENUE CORRIDOR**
- 2312.1 Wisconsin Avenue extends 4.5 miles north from the Georgetown waterfront to the District border, approximately 4.5 miles, to the Maryland state line, where it continues beyond the state line into Bethesda, Maryland. The road pre-dates the 1791 L'Enfant Plan. At one time, it was one of the main commercial routes ~~serv~~connecting the Port of Georgetown with communities farther north and was lined with houses and estates, some of which remain today. Today, ~~the~~ Wisconsin Avenue serves as the primary commercial and civic corridor for "Main Street" of several District neighborhoods, including Glover Park, Cathedral Heights, Tenleytown, and Friendship Heights. 2312.1
- 2312.2 The ~~current~~ mix of uses along the avenue is eclectic. Its lower portions include pedestrian-oriented shopping, mid- and high-rise apartment buildings, and prominent institutional uses including the Russian Embassy and the National Cathedral. ~~Further~~ Farther north, the avenue passes through relatively lower-density single-family neighborhoods, with a mix of retail uses, mid-rise office buildings including the national headquarters of Fannie Mae, churches places of worship, private schools, and other institutional uses. For several blocks on either

Is this phrase intended to require the property owner to pay for impact analysis? It would be important also to require public input including from nearby residents and others affected. This provision should not remove any responsibility of Optobas project impacts.

Draft Amendments

side of the Maryland line, the Avenue passes through a regional commercial center at Friendship Heights. The regional center includes large department stores, office buildings, and hotels on both the Maryland and District sides. 2312.2

2312.3

~~Most of the planning focus along the corridor has been on the portion of the Avenue north of Van Ness Street, particularly around the Metro stations at Tenleytown and Friendship Heights. During the past five years, land around the two Metro stations has been developing in a manner that is consistent with the previous Comprehensive Plan, with an 8-story residential building now under construction adjacent to the Friendship Heights station (Chase Point) and a new mixed-use project combining condominiums and retail uses at the Tenleytown station (Cityline). There are other sites similar to Chase Point and Cityline in the vicinity of both stations, and along the mile-long stretch of the avenue in between the stations. Private proposals to redevelop several of these sites are currently under consideration.~~ After years of planning and review, new mixed-use development has been completed on Wisconsin Avenue in recent years, including Cathedral Commons near McLean Gardens and a few residential buildings in Tenleytown. Along the corridor, smaller infill projects are adding new residents. Large tract projects at the old Fannie Mae building and neighboring 4000 Wisconsin Avenue are approved to bring several hundred new homes and commercial space, and the private schools on the corridor are also expanding. While the Friendship Heights Metro area has urbanized rapidly north of Western Avenue, there have been few changes on the District side. With changes underway and growth extending up Wisconsin Avenue, directed and coordinated planning is needed around both Tenleytown and Friendship Heights Metro station areas. 2312.3

This language will sound outdated immediately.

Include several of

2312.4

~~This Comprehensive Plan does not propose any significant departure in policy for the Upper Wisconsin Avenue corridor from the previous Comprehensive Plan. As stated in the prior plan, the Tenleytown and Friendship Heights Metro stations are important multi-modal transit hubs, that serve as termini for crosstown bus lines, as well as private institutional shuttles. Both station areas offer opportunities~~ continue to be opportunity areas for transit-oriented redevelopment, to improve streetscapes, create convivial public spaces, diversify the shopping experience, and create new housing, including affordable housing. Friendship Heights ~~continues to be~~ is a regional center, and Tenleytown ~~continues to be~~ is a multi-neighborhood center, each with ~~limited~~ opportunities for new retail and residential uses. Given the high land values in the neighborhoods along Wisconsin Avenue, redevelopment projects are an opportunity to increase the limited number of affordable and moderate income housing units in the Rock Creek West Planning Area. 2312.4

no comma

2312.5

~~Between Jennifer and Brandywine Streets, there are a number of vacant commercial buildings on the corridor. Their reuse with new local-serving retail uses and housing is encouraged. Additional measures are needed to upgrade the~~

Draft Amendments

~~streetscape, improve traffic flow, and address parking problems. Some of these measures are laid out in a traffic study for the Wisconsin Avenue corridor completed in 2005.~~ 2312.5

2312.6

Friendship Heights and Tenleytown are stable, transit-accessible ~~oriented~~ neighborhoods that will contribute to the sustainable and equitable growth of the city as new development arrives along Wisconsin Avenue. ~~and their conservation should be ensured during the coming years.~~ Thus, several core issues must be addressed as plans for any of the sites around the Metro stations or along the corridor move forward. Any redevelopment along the corridor should respect the scale of existing neighborhoods, promote walkability, and create a more attractive street environment. The impact of new development on traffic, parking, infrastructure, and public services must be mitigated to the greatest extent feasible. The scale and height of new development on the corridor should reflect the proximity transition appropriately to nearby single family homes, while the design of new buildings should reflect their urban transit-oriented context, ~~as well as the avenue's intended function as the neighborhood's main street. This means an emphasis on low to mid-rise mixed use buildings rather than high rise towers or auto-oriented strip development.~~ 2312.6

This is still important to keep.

or other low-rise residential development

and

2312.7

Urban design improvements ~~should~~ can make the Tenleytown Metro station area a more attractive and better-connected community hub in the future. With busy public schools, parks, a library, commercial uses, and new residential projects, the pedestrian, bicycle, and vehicular connectivity throughout the Tenleytown Metro station area remain an urban design challenge. In 2014, WMATA and DDOT completed a joint study of pedestrian access to the Tenleytown Metro station, recommending physical changes to address safety and access at this busy multi-modal area. ~~The low-density commercial area on the east side of Wisconsin between Albemarle and Brandywine would specifically benefit from streetscaping and façade improvements. The Metro station entrance located on the east side of Wisconsin Avenue at Albemarle Street is poorly designed and uninviting. Improving the public realm in this location would contribute to the vibrancy of the block as a whole and improve pedestrian safety and comfort. Amenities such as public art, more attractive facades, and street trees should be encouraged. Attention also should be paid to reducing pedestrian-vehicle conflicts, both along Albemarle Street across streets and within sites, and ensuring safe pedestrian access to the east side both Metro Station entrances.~~ 2312.7

2312.8

Policy RCW-2.2.1: Housing Opportunities

Recognize Pursue the opportunity for additional housing, including affordable and moderate income housing, with some retail and limited office space on ~~the east side of Wisconsin Avenue between Albemarle and Brandywine Streets, on the Lord and Taylor parking lot, on the Metro (WMATA) bus garage and underdeveloped sites west of the Friendship Heights metro station, and on~~

Draft Amendments

~~underutilized commercially-zoned sites on Wisconsin Avenue. Any development in these areas should be compatible with the existing residential neighborhoods.~~
2312.8

- 2312.9 **Policy RCW-2.2.2: Tenleytown and Friendships Heights Metrorail Station Areas**
~~Support coordinated planning for Wisconsin Avenue's to Stimulate a well-planned economic activity center at the~~ Tenleytown **and Friendship Heights** Metrorail station areas, ~~generally defined as the area bounded by extending north~~ **from Van Ness to the Maryland state line at Western Avenue. Albemarle, Brandywine, Fort Drive, and 42nd Street. This center should** **Planning** **considerations for the corridor include:**

- a. Utilize the public transit infrastructure and maximize Metrorail **and bus** access;
- b. Enable merchants to upgrade existing businesses, attract new customers and new business establishments, and **provide neighborhood** ~~give residents needed~~ services;
- c. Provide for the development of new housing **for a mix of incomes;**
- d. Protect and preserve existing low density residences in the vicinity, and the surrounding institutions and local public facilities **by mitigating** ~~from~~ the adverse effects of development; and
- e. ~~Maintain heights and densities at appropriate levels, with architectural~~ **Site planning and building** design ~~should be that is~~ sensitive to the area's topography, **existing architectural assets, street layout, and pedestrian circulation patterns.** ~~relative to the District.~~
- f. **Promote safe and comfortable pedestrian and bicycle circulation to parks, schools, transit, and shopping, as outlined in the Rock Creek West II Livability Study.**
 Need a verb here
 ADD verb such as Promote
- g. **A robust public life on the corridor, with key public spaces that function as places where neighbors and visitors want to stay, linger, and enjoy.**
- h. **Partner and collaborate with public and private institutional and educational facilities along the corridor.** 2312.9

- 2312.10 **Policy RCW-2.2.3: National Cathedral**
~~Protect the Washington National Cathedral from development that would despoil its setting or further exacerbate traffic on its perimeter. Any development adjacent to the National Cathedral should complement its setting and mitigate direct traffic impacts on the Cathedral's operations. At the same~~

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time, the Cathedral's ~~Ensure that~~ traffic, parking, and activity impacts should not ~~generated by the Cathedral do not~~ diminish the quality of life in the surrounding neighborhoods. 2312.10

- 2312.11 **Policy RCW-2.2.4: Wisconsin and Western Avenues** *measures to ensure*
Require that any changes to facilitate through-traffic on Wisconsin and Western Avenues are accompanied by pedestrian and bicycle safety measures and ease adverse effects of traffic on local streets ~~include measures to minimize adverse effects on adjacent residential neighborhoods.~~ 2312.11

- 2312.12 **Policy RCW-2.2.5: Land Use Compatibility Along Wisconsin Avenue**
~~Ensure that future~~ **Future** development along Wisconsin Avenue should be is ~~physically compatible with and~~ architecturally sensitive to adjoining residential neighborhoods ~~and is appropriately scaled given the lot depths, widths, and parcel shapes.~~ Use a variety of means to improve the interface between ~~commercial~~ **mixed-use** districts and **lower-scale** residential uses, such as architectural design, the stepping down of building heights away from the avenue, landscaping and screening, and additional green space improvements. 2312.12

implement recommendations in DDOT's completed Livability Studies and

- NEW** **Policy RCW: Livability in Rock Creek West**
Continue to evaluate transportation safety and quality of life issues for all users of the street network and identify concrete actions to increase transportation options and safety.

- 2312.13 **Action RCW-2.2.A: Friendship Heights Task Force**
~~Improve inter-jurisdictional cooperation to address transportation issues related to Friendship Heights. Continue the efforts of the Friendship Heights Task Force established in 1998 to review and coordinate land use and transportation decision-making in the Friendship Heights area.~~ **Obsolete-See Implementation Element** 2312.13

- X 2312.14 **Action RCW-2.2.B: Implement Traffic Signal Improvements From WACTS**
Implement the recommendations from the 2005 DDOT Wisconsin Avenue Corridor Study regarding traffic light synchronization as well as semiactuating lights at specific intersections along Wisconsin Avenue. Ensure that signal timing changes do not adversely affect neighborhoods by causing long queues of idling cars on side streets. **Completed-See Implementation Element** 2312.14

- 2312.15 **Action RCW-2.2.C: Zoning and Design Measures**
Continue to work with the community, the Advisory Neighborhood Commissions, and local property owners to address concerns regarding building density and height, planned unit developments and related density bonuses, and architectural design in the Planning Area. Zoning techniques should be considered to break up the auto-oriented commercial appearance of much of Wisconsin Avenue and

*NOTE:
In Glover Park,
all traffic signals
need to be
reviewed again,
and DDOT is now
planning to do
that.*

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instead create a more pedestrian-oriented street, distinct in function and visual character from adjacent residential areas. 2312.15

NEW**Action RCW: Livability**

Implement the recommendations in the Rock Creek West II Livability Study completed in 2011, and subsequent livability studies completed.

NEW**Action RCW: Wisconsin Avenue Planning**

Craft a coordinated vision with the District and community to better understand the realities of change along northern Wisconsin Avenue to inform future development and manage growth on Wisconsin Avenue corridor at the Tenleytown and Friendship Heights Metro station areas. A plan will identify opportunities for urban design, commerce, housing, mobility, culture, public space, and community facilities to preserve a high-standard urban quality of life and advance District policies promoting inclusive prosperity.

NEW**RCW-2.3 VAN NESS COMMERCIAL DISTRICT**

At the Van Ness Metrorail station on the Connecticut Avenue corridor, the Van Ness commercial district is a multi-neighborhood center with a shopping district, institutional and office buildings, and several mid- to high-rise residential buildings. The area includes the 20-acre campus of the University of the District of Columbia (UDC) which has an enrollment of over 5,000 students as well as the International Chancery Complex.

Recent improvements to the Van Ness commercial district include the new UDC Student Center, the Park Van Ness redevelopment, and the creation of the Van Ness Main Street organization. However, this section of the corridor suffers from a challenging street environment that is not welcoming to pedestrians, with an excess of hardscaped surfaces and noted parking problems. A lack of distinctive facades and storefronts offer a limited range of retail goods and services. Meanwhile, ground floor retail space has been lost to institutional and school uses. Opportunities exist for greater synergy between UDC and nearby shopping areas along Connecticut Avenue.

A Campus Plan for UDC was completed in 2011 to guide campus growth and development at Van Ness through 2020 as its flagship location. The Campus Plan recommends optimizing the university's facilities, providing an environment for cultural exchange, to enliven the surrounding community, and greening the campus. As the Campus Plan is implemented, efforts should be made to improve the public space around the Metro station and make future facility development compatible with the surrounding neighborhood.

From: Danny Clark <daclark8192@gmail.com>

Sent: Friday, January 10, 2020 2:11 PM

To: plandc <compplanupdate@dc.gov>

Cc: abonds@dccouncil.us; rwhite@dccouncil.us; dgrosso@dccouncil.us; esilverman@dccouncil.us; Cheh, Mary (COUNCIL) <MCheh@DCCOUNCIL.US>; Mendelson, Phil (COUNCIL) <PMENDELSON@DCCOUNCIL.US>; Turmail, Brian G. (SMD 3B05) <3B05@anc.dc.gov>; Young, Mary C. (SMD 3B04) <3B04@anc.dc.gov>; Lane, Melissa (SMD 3B03) <3B03@anc.dc.gov>; Blumenthal, Jackie (SMD 3B02) <3B02@anc.dc.gov>; Mladinov, Ann Lane (SMD 3B01) <3B01.ANC@dc.gov>

Subject: Comprehensive Plan

Dear Office of Planning and ANC3B members,

I'm writing to express my support for the Office of Planning's proposed amendments to the remaining sections of the Comprehensive Plan.

I live near the border of Glover Park and Cathedral Heights on Wisconsin Avenue and there is not enough density in the neighborhood. While there are apartment complexes on one side of the street that serve the needs of students and working families, on the other side there are single family homes that cost millions of dollars that serve only wealthy residents. There is not enough affordable housing in our neighborhood as low density housing is prioritized. Glover Park and Cathedral Heights need to do their fair share to build more housing in DC so it can be affordable.

I want to support the proposed changes to the Comprehensive Plan and further suggest that richer, less dense parts of the city need to share in the responsibility to create more housing. The entire city should be moderate-density mixed use, and areas close to transit should be high-density mixed use. Single family homes along a major bus route, like there are in my neighborhood, is not conducive to housing affordability or good transportation policy.

My wife and I are expecting a child and want to remain in DC to raise our children. We're lucky to have some financial stability that lets us live in this wonderful city. I want to make sure that the city my child grows up in is affordable for all. By committing to building more housing, especially affordable housing, we can accomplish this.

Thank you for considering my comments,

Daniel Clark

From: da zowader <dazowader@gmail.com>

Subject: Draft DC Comprehensive Plan Presentation at Wilson High School

Date: December 12, 2019 at 1:55:35 PM EST

To: ann.mladinov@gmail.com

Cc: da zowader don <dazowader@gmail.com>

A PLEASURE TO MEET YOU AT THE MEETING AT WILSON HIGH SCHOOL LAST WEEK.

MY CONCERNS ARE AS FOLLOWS.

I THINK IT IS NOT AT ALL REASONABLE TO EXPECT LOCAL RETAIL TO SET UP THEIR BUSINESSES AND SUCCEED I THE NEW BUILDINGS THAT ARE PROPOSED IN TENLEYTOWN.

THE BUILDERS ARE BUILDING EXPENSIVE STRUCTURES WITH CONDOMINIUMS AND APARTMENTS—AND THEY SAY THEY WILL ATTRACT LOCAL RETAIL.!—NO WAY.

THERE IS NO REALISTIC WAY THAT LOCAL RETAIL CAN SUCCEED. THERE IS AMPLE PROOF OF THAT BY LOOKING AT THE PLACES THAT ARE EMPTY FROM ATTEMPTED LOCAL BUSINESS WHO HAVE NOT BEEN ABLE TO SUCCEED BECAUSE OF HIGH COSTS.

AND WE DO NOT NEED MORE CHAIN STORES WHICH WE ALREADY HAVE ENOUGH.

HAVE THE BUILDERS MAKE THEIR TOTAL BUILDINGS FOR PEOPLE TO LIVE WITH APARTMENTS AND CONDOS.

AND MAKE THE AFFORDABLE HOUSING PORTION 33%—NOT 15%—AND WITH A FAIR AMOUNT OF PLACES TO PARK A CAR.

CARS ARE NOT GOING TO GO AWAY JUST BECAUSE WE WOULD LIKE PEOPLE TO RIDE BIKES. (AN INTERESTING NOTE IS THAT I SEE A LOT OF YOYNG PEOPLE WITH CARS WITH BIKE RACKS CARRYING BIKES)--

WE NEED MORE PLACES FOR MORE PEOPLE WHO ARE NOT WEALTHY AND ARE CRITICAL TO OUR COMMUNITY—LIKE FIREMEN, POLICEMAN, TEACHERS FOR THE OVERCROWDED SCHOOLS, RESCUE SQUAD PERSONNEL, AND NURSES.

OUR COMMUNITY IS VIBRANT AND NEEDS IMPORTANT PERMANENT PEOPLE WHO ARE NECESSARY TO KEEP IT VIBRANT—NOT JUST COLLEGE STUDENTS.

AND BEFORE YOU DECIDE TO MAKE PLANS TO INCREASE THE HEIGHT ALLOWANCES—THERE SHOULD BE AN ASSESSMENT OF THE IMPACT OF THESE CHANGES IN THE COMMUNITY NEIGHBORHOODS—ESPECIALLY SCHOOLS, TRANSPORTATION, PARKING AND UTILITIES.

I UNDERSTAND THERE NEEDS TO BE CHANGE AS OUR CITY EXPANDS.—

I JUST WANT IT TO BE DONE SMARTLY WITH THOUGHT AND PLANNING BEFORE ALLOWING PEOPLE TO BUILD WITH MINIMAL THOUGHT OTHER THAN HOW MUCH MONEY THEY CAN MAKE.

Thanks for your understanding and consideration

DON ZOWADER- (older guy with large white mustache)

From: Brian Cohen <brian.a.cohen@gmail.com>

Subject: Tonight's agenda item on amendments to the DC Comprehensive Plan

Date: February 13, 2020 at 5:47:33 PM EST

To: Jackie Blumenthal <jackieblumenthal@gmail.com>, Brian Turmail <turmailb@agc.org>, Melissa Lane <mjlancedc@mac.com>, Ann Mladinov <ann.mladinov@gmail.com>, "Mary C. Young" <mcy65@rcn.com>

Good afternoon Commissioners - I just wanted to weigh in on the agenda item tonight on the DC Comprehensive Plan. I see from the agenda that the ANC will be voting on a proposed letter to the Office of Planning.

I hope you will vote to support finalizing and passing the plan and its amendments as rapidly as possible. This plan is long overdue - it has been in the works for years and has been subject to numerous opportunities for public input and comment.

The plan is particularly important for the Glover Park and Cathedral Heights neighborhoods. As you know, our community faces several major challenges. Our commercial district is struggling; Metro is threatening significant cuts in bus service to our communities; and rents and housing costs are increasing rapidly, creating challenges for those who seek to stay long-term in rental apartments, age in place, or are hopeful that their adult children are able to live in the same neighborhood where they grew up.

The comprehensive plan is not a magic bullet, but it would put a long-term framework in place that would help fix many of these problems. It would increase the housing supply, creating opportunities for more people to live in, enjoy, and revitalize our neighborhoods. It would improve long-term transit planning and transportation options, reducing traffic and making it easier for residents of our community to get to work, school, and play; and it would help stabilize and improve our commercial district.

This comprehensive plan would have significant benefits for current and future residents of Glover Park and Cathedral Heights, and it is time that it move forward. I hope you will vote for a favorable letter this evening.

Sincerely,

Brian A. Cohen
ANC 3B-05 Resident
3908 Benton St. NW

ATTACHMENT A

Other Points on ANC3B Priorities I Select Elements of Draft Amended DC Comprehensive Plan February 13, 2020

I. ROCK CREEK WEST AREA ELEMENT: Neighborhoods

The Rock Creek West Area Element highlights the importance of preserving stable, attractive residential neighborhoods. The quality of life in the area is generally perceived as very high, which is related to economic vitality, environmental quality, public safety and security, good public services, parks and recreation, sound housing stock, the supportive and welcoming community, and the energy created by a vibrant, diverse population engaged in the life of the community. Those are characteristics that neighborhoods aspire to, and residents want to sustain, so the ANC area appreciates the emphasis in the Area Element on preserving stable neighborhoods

The major arterial street in Glover Park-Cathedral Heights is Wisconsin Avenue, including the commercial area in Glover Park which has recently been selected for one of the city's newest Main Street programs. One of the challenges for the Glover Park commercial area and the Main Street is sustaining the level of retail and commercial activity by attracting new businesses and keeping the vacancy rate low for storefronts and other commercial properties. Competition with online sales has affected retail businesses around the city and the nation, while restaurants and cafes are in competition with establishments in other neighborhoods. The development of new hubs of retail and restaurants and entertainments destinations in areas such as 14th Street NW, H Street NE, NoMa, Union Market, the Wharf and Navy Yard draw customers from District neighborhoods as well as tourists and visitors from around the region. Many local businesses in Glover Park have noted that the combination of on demand delivery to your door and easy access to relatively economical ride-hailing services have made it much easier to take advantage of attractive dining and shopping options other than the establishments a short walk away on Wisconsin Avenue, and that has cut significantly into their business. Nearby neighborhood commercial corridors including those guided by Main Street programs in Woodley Park and Tenleytown, as well as Cathedral Commons, Cleveland Park and Georgetown-Burleith also compete with each other for customers, especially in a market where a declining number of brick and mortar retail establishments are able to sustain themselves.

Other highly popular areas have lost commercial tenants as the number of visitors and the volume of purchases go down, leaving vacant properties and dwindling chances to sustain the businesses that remain. This is a challenge that ANCs and planners around the city will have to take into account. Some properties that have been in use for commercial and retail for decades back, as long as any current residents can remember, are difficult to rent for new restaurants or retail. Are they going to be viable for that use in the future? Mixed use and residential development may help to support local retail businesses, or residences may replace retail and commercial uses in some instances. Close market analysis and careful planning will be needed in neighborhood commercial districts such as Glover Park to maintain the viability of the area and continue to ensure local services are available for residents.

II. ROCK CREEK WEST AREA ELEMENT and ENVIRONMENTAL PROTECTION: Tree Canopy

The Comp Plan includes a text box about the environmental goals adopted in the Clean Energy DC legislation last year, as well as goals expanding the tree canopy and reducing the effect of “heat islands.” These goals are important for all areas of the city, and should be incorporated in plans for development including construction and renovation and other land use decisions.

The city’s many trees are a distinctive feature which adds to the attractiveness for visitors and residents. At ANC public meetings in the past year where the Comp Plan was discussed, several residents highlighted the importance of preserving the green appearance created by the street trees and other landscaping, which are so noticeable to anyone arriving in the city. That includes arrivals via the ‘gateways’ in Rock Creek West, for example, the circles at Western Avenue and Massachusetts Avenue and at Western Avenue and Connecticut Avenue.

ANC3/4G also has emphasized the importance of maintaining the environmental character of the Connecticut Avenue gateway. The tree canopy and “green” look of the area that visitors see as they enter the city are a particularly valued part of the character of the area. The trees and parks and “public parking” not only contribute to the quality of life but also to the quality of the overall environment and health for the community and the city as a whole, through the reduction of carbon dioxide, a key greenhouse gas, as well as the reduction of temperatures at the street level, the “heat island” effect that creates micro-level and macro-level harms to human health and well-being and human and environmental health in the city. Perhaps those points could be added to the sections on the three Policy Focus Areas, such as in ¶2311.7 *Policy RCW-2.1.1: Connecticut Avenue Corridor*.

Casey Trees, the non-profit that works with households and organizations to plant and care for new trees, recently shared maps and statistics about the extent of impervious surface in the District, which has been increasing over recent decades. The latest estimate is that 43% of District land area is accounted for by impervious surfaces, including paved streets and sidewalks, parking lots, impermeable playgrounds and patios, as well as rooftops. In contrast, the area categorized as “tree canopy cover” is only 38% of the District land area and the aerial maps show a steady reduction in tree canopy from 1984 to recent years. In 2016, the Mayor established new goals for the tree canopy in the District, aiming for 40% tree canopy cover by 2032, which will require preserving existing trees, planting more trees, and replacing damaged or dying trees that have to be removed.

Impervious surfaces absorb heat, creating higher ambient temperatures around the city (the “heat island” effect) and exacerbating breathing problems, stress, and other health challenges. Impervious surfaces also create increased run-off into our storm sewers, often containing oils and other chemicals, waste products and sediments flowing into storm sewers and on to rivers and streams. Trees and plants can have an opposite effect, increasing shade, reducing heat, absorbing carbon dioxide. Recent research indicates that low-income neighborhoods often have more impervious surface areas than other areas of the city and a smaller proportion of tree canopy. The result is higher temperatures in the summer which are also related to worse health outcomes for residents. This is another example of environmental injustice, and it is good to see the concerns reflected in the Comp Plan ¶E-1-1.2 Urban Heat Island Mitigation,

which includes tree canopy. These considerations should be part of land use policies, development plans and decisions throughout the District.

III. HOUSING ELEMENT

Housing is vital to residents' well-being and the important goals and values of being a welcoming and inclusive city, which the Comp Plan is intended to meet. ANC3B appreciates the emphasis on creating additional opportunities to live in the District, including affordable housing throughout the District. Creating and preserving affordable housing has been a goal that our ANC has been strongly supporting, for all levels of affordability—from severe low income to 30%, 60% and 80% of Area Median Income, including workforce housing, dedicated housing for military veterans with limited resources, long-term supported housing for formerly homeless individuals and households, as well as short-term emergency shelters for homeless families such as The Brooks on Idaho Avenue, assisted living and nursing care for seniors and others who need it. Housing will be needed for new residents, young professionals moving into the workforce, growing families, households looking to downsize, and families and individuals seeking rapid rehousing after experiencing financial crises or homelessness. (In January, the Interagency Council on Homelessness shared its draft update of the District's *Homeward DC* plan for preventing and eliminating homelessness, which estimates that the city needs 1,500 more "slots" for individuals looking for rapid rehousing, which is a repeating demand as more individuals fall into difficulties and need their own longer-term housing.)

The Comp Plan needs to provide for constructing and preserving housing in the city that will meet each of those needs, including affordable housing. The Mayor's goals of 36,000 new housing units across all wards by 2025, including 12,000 "affordable" units, while admirable, seems far short of the needs, particularly for low-cost housing. Plans need to accommodate the number of residents who are on a District waiting list for public housing and housing vouchers, are paying far more than the target 30% of monthly income on housing, need replacements for deteriorating housing where they are now living, cannot find economical housing to which they can move to fit the changing number of household members, or are currently homeless.

High cost or "luxury housing" seems to be in ample supply, with new units being added through new construction and conversion of older units. What is in short supply is housing that can accommodate low and moderate income households. The city needs to create incentive programs to encourage more affordable units, preserve existing affordable units, identify prospective properties where affordable and mixed income projects can be encouraged, and make it a priority to encourage low and moderate cost housing along transit corridors with available services so the available sites are not being exclusively devoted to high-cost housing. ANC3B has a new project coming online for affordable workforce housing on Wisconsin Avenue in the Glover Park commercial district, which the ANC encourages and welcomes. It is important for additional projects to be developed on or near the Wisconsin Avenue corridor that provide affordable housing, and the ANC hopes to assist in meeting that goal. The provisions H-1.3.4 for co-housing and H-1.3.6 for Single Room Occupancy units can be very useful, along with ¶1309.12 discouraging tear-downs of existing moderate cost housing.

The District must also specifically plan for housing that provides services to individuals requiring ongoing assistance for social services or medical or mental health treatment, whether they have been experiencing homelessness or facing other challenges. If District agencies have assessed individuals as needing support services and assigned case workers or other service providers to assist them, it is essential that they not be cut off from the services when they are able to move to a new unit such as dedicated affordable housing, whether under a voucher program or other public housing program. That has been happening too often and it is not right or fair or effective in protecting the health and quality of life of residents. Our ANC has maintained close touch with DHS, DBH, DCHD, the Council, senior services agencies and providers of services for individuals experiencing homelessness, and this is always a major issue in the discussion. Residents who have been receiving social services and medical or mental health services and have been identified as needing continuing assistance deserve better from the city. The Comp Plan and other plans for housing and other services must not ignore these vital social and health needs, and just focus on the availability of physical units to house them. The city must provide for those needs or we will not be meeting stated goals for housing equity.

A. Definition of Affordable Housing: One concern raised in ANC3B and other ANCs is the suggestion in the amended Comp Plan, as well as in the Housing Equity Report of October 15, 2019, to define affordable housing goals only in terms of “dedicated affordable housing” that will be “limited to” individuals meeting certain income standards. That approach would only count those forms of “dedicated” housing as distinguished from “naturally occurring” affordable housing available on the market, such as rent-controlled apartments and other housing priced at levels affordable to people with low or moderate income. See the new paragraph after ¶P500.3 of the Housing Element (p. 3 of 79)

Publicly supported housing, such as public housing and housing provided under public programs such as Housing Choice Vouchers may be easier to count and map than the fuller range of affordable housing, but that does not mean that for policy purposes the city should not pay very close attention to the wide range of other affordable housing in its planning and analysis. If city agencies and plans accept the suggested definition in setting and carrying out goals for creating and preserving affordable housing in the coming years, the District will be missing a major part of the housing that meets the needs of low and moderate income residents today. The greatest loss of affordable housing in the District in recent decades has been in the “naturally occurring” category where the housing is provided and paid for in the private market. That does not make the losses any less damaging for the residents or the city. It is very important that the city does not lose increasing numbers of housing units that are now available at affordable prices on the market, including rent-controlled apartments and private homes, which are already highly vulnerable to being razed and replaced or converted to higher-priced housing as development pressures continue.

B. Preserving Affordable Housing on the Market: Our ANC area is known as one of the few places where young professionals and others can find affordable housing in an attractive neighborhood within relatively short distance from downtown, jobs, schools, and essential services. For the health and vibrancy of the community and the continued diversity of income and backgrounds of residents, it is vitally important to preserve this type of affordable housing

in our neighborhood, whether in rent-controlled buildings, accessory dwelling units, co-housing or other economically priced housing that currently exist in Glover Park-Cathedral Heights, even as the city also increases the number of new affordable units being created. The same applies across the city. The city should have clear goals for building and preserving these types of affordable housing in the market, though they may not meet the definition of “dedicated affordable housing” limited to residents at certain income levels, under publicly subsidized programs. Policies to provide financial Incentives should also be considered.

C. Linking Housing Plans to Infrastructure Plans: The Mayor’s housing goals call for significant additional housing around the city, including in transit-oriented developments along Metrorail routes. In Rock Creek West, the Comp Plan highlights Friendship Heights as well as portions of Connecticut Avenue for additional housing density. The additional residents associated with the new housing units will necessarily require additional infrastructure, whether it is utility services, transportation, or public facilities. The capacity of the infrastructure and plans for expanding it must be considered at the same time the housing is planned, or the area will not be able to continue to function effectively for any residents.

D. Planning for School Capacity: The city’s estimates are that all the elementary schools in Ward 3 will be at more than 110% of capacity in the coming decade. Many of those schools are already operating at more than that level and are likely only to face greater shortages in capacity compared to the number of students who would like to enroll. In recent years, our local elementary school, Stoddert School has ranked as the most overcrowded school in the city, with enrollment at 135% of capacity—the most overcrowded school in the city. Even after a recent renovation, the school is using closets, administrative space and “demountable” classrooms to accommodate all the students. Other elementary schools in the area, along with the middle schools and high school, are also operating over their estimated capacity. The educational quality at local schools remains high, but the overcrowding creates serious strain on the facilities and limitations on the educational experience the schools can offer. It is a major concern for the community that future additions to the housing stock, particularly for families, will add further to the problems of overcapacity. The city is already struggling to identify remedies for the overcrowding situation, even as forecasts of future enrollment in the Rock Creek West area continue to rise.

The 2018 *Public Education Master Facilities Plan* predicted that 2,500 more students would be enrolling in Wilson feeder schools by 2027-2028. Many of the local elementary schools have been beautifully renovated and expanded over the past decade, and are already overcapacity again. The sites are built out to the point that the required capacity is going to require construction of additional schools. Over the past two years, the Wilson High School Feeder Pattern Community Working Group developed an assessment of expected capacity needs and estimated that 2025 “high-end” forecast scenarios, the average projected utilization across the feeder pattern would reach 128% in their “high end” forecast. In its February 8, 2019, report, the Ward 3-Wilson Feeder Educational Network called for construction of two new elementary schools, a middle school, and a high school. Sites would have to be identified for any of these new schools.

The city's next Master Facilities Plan should address this serious challenge, and deal with the question of how and where land can be found for needed new schools, how development can be distributed to encourage residents to make use of schools that are operating at less than capacity, and how housing projects can be located to ease strain on already overcapacity schools. Planning for housing development in areas with overcrowded schools must take into account potential effects on public school enrollment, and planning for school capacity must accompany plans for additional housing for families in the area.

IV. LAND USE ELEMENT: SUCCESSFUL NEIGHBORHOODS

The ANC appreciates the emphasis in the Rock Creek West Area Element on maintaining and preserving stable neighborhoods. But the Land Use Element that deals with overall planning for neighborhoods does not use the word "stable." The amendments dealing with "Successful Neighborhoods" and policies to ensure a high quality of life in the District's residential neighborhoods would remove the word "successful" from critical provisions and instead use the word "inclusive" echoing the title of the 2006 Comp Plan, "Building an Inclusive City." [See ¶1308 and following sections of the Land Use Element].

The ANC agrees with the goals of an inclusive city that welcomes all residents in all neighborhoods and communities. That is an important value for the city, as the Comp Plan highlights. But to capture the full meaning and goals of successful neighborhoods still included in various other provisions of the Land Use Element, it would be more in keeping with the rest of the language and provisions if the title of this section and other provisions dealing with the character of neighborhoods NOT substitute the word "inclusive" for the word "successful" in the title and other operative sentences, but use "inclusive" as part of the title and description of successful neighborhoods. It would be far more meaningful and helpful for residents, communities, and planners trying to sustain and foster well-functioning, healthy, safe and inclusive neighborhoods if the headings and opening sentences of those sections of the plan refer to the range of characteristics that make for a "successful neighborhood" and a "great neighborhood," as other paragraphs in those sections still call for, including ¶1309.6 "What Makes a Great Neighborhood?" As important as being inclusive is and will continue to be, achieving a vibrant, thriving, and welcoming neighborhood requires other features if it is going to be viable and sustainable for the longer term, including economic strength, access to housing and transportation, the quality of public facilities and amenities, schools, parks and physical environment, recreational and social opportunities, and less tangible aspects of the "social capital" of a community. The key paragraphs about planning for high quality of life in District neighborhoods should continue to reflect more of those factors, even as they underline the importance that the neighborhoods be inclusive.

V. AREA ELEMENT ANACOSTIA RIVERFRONT

Another important "gateway" to the city is the Southeast entrance alongside the Potomac River, via the Anacostia waterfront. The Comprehensive Plan considers the Anacostia waterfront as its own Area Element, separate from the rest of Anacostia. The waterfront has no permanent residents which makes it a bit awkward to speak about who the people are that the Area Element is aimed at. However, the green areas and park facilities on the Anacostia waterfront have for decades served the people who live in Anacostia, for recreation, relief from

heat in the summer, relaxation in the beauty of the shoreline, the wider horizons the vistas provide, and connection to each other and to the larger city and region around them. At one ANC roundtable about the Comp Plan amendment cycle, an ANC member from Ward 8 asked the OP staff, “Why did you take the waterfront away from us?” noting that the maps in the draft Comp Plan have created a new boundary, a line between the people of Anacostia and their waterfront, and instead of talking about what the community wants to see along the waterfront, is proposing a new mixed use center for upscale market from outside Anacostia, similar to The Wharf recently opened in Southwest Washington.

The Anacostia Waterfront is a large and uniquely special area with huge potential and major attractions to meet many different interests. Should the Anacostia Waterfront be heavily developed for commercial use? Should the Anacostia Waterfront be planned for people other than the residents living nearby who need and want to have parkland and recreational facilities there to enjoy with their families and friends? Is commercial development the highest and best use for that special riverside environment, particularly when the city is looking for ways to keep green space, preserve natural habitat, and reduce impervious surface area in the city? Is there a need for a regional-scale commercial center along the Anacostia waterfront or would it be more appropriate to plan local-scale attractions for the local community that would better serve their needs? Can all these interests be accommodated in that area? The residents closest to the Anacostia Waterfront should be at the heart of planning efforts for that land and the major environmental and recreational amenity it represents for the community.

There are also questions of whether there is a risk that a large regional commercial development along the Anacostia Waterfront would draw patrons from existing developments and make it more difficult for the restaurants and other business establishments in those areas to survive and thrive. The District has the Georgetown Waterfront, Navy Yard, and the Southwest Waterfront/“The Wharf” which are developed with restaurants and bars and promenades that are crowded in evenings and weekends with tourists as well as residents from around the region. The city also has seen mixed use development with restaurants, shops, other commercial and residential projects in NoMa, H Street, 14th Street, Union Market, Shaw and other emerging centers for cafes and theaters and bars and related destination commercial establishments. They are competing with each other and with the older commercial centers around the city including Georgetown and neighborhood commercial centers along Wisconsin Avenue and Connecticut Avenue in Rock Creek West. The new areas offer vibrant, eye-catching contemporary developments that draw people from miles away to experience the food and entertainment available there. Is the market sufficient that they can attract sufficient customers without taking away from the business that the other areas need to sustain themselves? If not, it is important to consider those potential effects before developing new plans for commercial development along the waterfront land in the District and committing to more large-scale development along the same lines those other areas have followed. And the process of developing a vision for that area of the waterfront on the south side of the Anacostia River should start by including the people living closest to that waterfront land, the people of Anacostia.

Attachment B

ANC3B Recommendations for Specific Provisions of Area Element for Rock Creek West February 13, 2020

The land area in the ANC3B area of Glover Park and Cathedral Heights is primarily devoted to residential use, with local commercial development primarily along Wisconsin Avenue in Glover Park.

¶2300.2 notes “Rock Creek West’s most outstanding characteristic is its stable, attractive neighborhoods.” We are pleased to see that paragraph retained, as the stable attractive neighborhoods in our ANC provide a high quality of life for people who live there and visit, shop, or go to the parks and restaurants and other commercial establishments. The character of the neighborhoods is very important in attracting and retaining residents and businesses.

We would also point to the importance of the tree canopy to the environment, which we highlight in the section on the Environment below. This should be referred to as a major part of the character of the neighborhoods in this paragraph and should be emphasized as a major part of ¶2309 Conserving and Enhancing Community Resources, including the Naval Observatory Grounds (see below), ¶2309.4 National Park Service Areas, and ¶2309.6 historic resources.

¶2300.5 adds a paragraph on retail districts along the area’s major corridors, highlighting the competition that commercial corridors in Rock Creek West have experienced for customers and for new restaurants and retailers. This is a very important point and should be reflected in local planning and policies. This paragraph mentions Main Street organizations in the area. We would suggest that the final sentence be amended to say, “Additionally, Main Street organizations in Tenleytown and Van Ness as well as in Glover Park and Woodley Park are working to help attract desired retailers and enliven and improve the commercial areas.”

¶2300.10 adds a new sentence “Main Street organizations have been established for Van Ness and Tenleytown.” We recommend that sentence be amended to add the Main Street organizations in Glover Park and Woodley Park.

¶2308.2 Policy *RCW-1.1.1: Neighborhood Conservation* as amended calls for the city to “Preserve the low density, stable neighborhoods west of Rock Creek Park” and goes on to highlight the “character of these neighborhoods,” which we support. The amendments add a new final sentence acknowledging **“Updates to the Zoning Regulations offer the opportunity to create more accessory dwelling units for this area to help absorb a share of the District’s growth and provide for a more proportional share of the District’s growth and provide a more proportional share of affordable and moderate income housing sensitive to existing neighborhood context.”** Our ANC has strongly supported ADUs and also building and preserving affordable and moderately priced housing, so we support this provision with the amendment.

¶2308.4 Policy *RCW-1.1.2: Conserving Neighborhood Commercial Centers*

This provision calls for the city to “Support and sustain local retail uses and small businesses in the area’s neighborhood commercial centers . . . Compatible new uses such as multi-family housing or neighborhood-serving office space (above local-serving ground-floor retail uses) should be considered within the area’s commercial centers to meet affordable **and moderate income** housing needs, **provide transit-oriented development**, and sustain **existing and** new neighborhood-serving retail and small businesses.” The ANC supports this provision as consistent with the hopes and interests of our area.

¶2308.5 Policy *RCW-1.1.4 Infill Development*

This provision calls for the city to “Recognize the opportunity for infill development within the areas designated for commercial land use on the Future Land Use Maps. When such development is proposed,

work with ANC's, residents, and community organizations to encourage **mixed-use** projects that combine housing, **including affordable housing, neighborhood serving retail**, and commercial uses.” The amendment, however, would delete an important provision which the ANC would like to see retained: “Heights and densities for such development should be appropriate to the scale and character of adjoining communities.” The ANC supports this provision as consistent with the hopes and interests of our commercial area and nearby residential areas.

¶2308.8 Policy RCW -1.1.7: Housing for Seniors and Disabled Residents

This provision calls for the city to “Maintain and increase housing for elderly and disabled residents, especially along the major transportation and commercial corridors of Wisconsin and Connecticut Avenues.” The ANC supports the objective and content of this policy but recommends that the title and first sentence be consistent in referring to “Seniors and residents with disabilities.”

¶2309 Conserving and Enhancing Community Resources includes several provisions related to National Park Service land such as Glover Archbold Park and Rock Creek Park (¶2309.2e) and three provisions dealing with the U.S. Naval Observatory. We support those provisions. The ANC is bordered on the west by Glover Archbold Park and on the east by a narrow stretch of Rock Creek Park at the southeast corner and north of that by the U.S. Naval Observatory. The Naval Observatory Grounds are located directly behind the commercial establishments on the east side of Wisconsin Avenue for virtually the entire length of the Glover Park commercial area. Both the National Park land and the Naval Observatory provide extensive tree canopy and green areas adjacent to the neighborhood.

The Naval Observatory is an important and long-time part of the community and we work coordinate when there are plans for projects within or adjacent to the Observatory Grounds. The mission of the Observatory also requires special considerations of lighting as well as building height in the Glover Park commercial district.

¶2309.2(d) highlights the policy to conserve the scenic resource of the U.S. Naval Observatory Grounds, which we are happy to see retained in the amended draft Comp Plan.

¶2309.5 Policy RCW-1.2.4: Cultural and Tourist Attractions mentions a policy to “encourage broader recognition of other attractions in the area, such as the Naval Observatory . . .” Our neighborhood is fortunate to have the large green area and significant and attractive tree canopy provided by the Naval Observatory, which is lovely to see from a distance, outside the fences. We would note that with present security provisions and extremely limited areas or opportunities for tourists to observe the grounds and structures, the potential for additional recognition of the Naval Observatory as an attraction seems minimal.

¶2309.7 Policy RCW-1.2.6: Naval Observatory calls for ensuring that planning decisions in the vicinity of the Naval Observatory consider the possible impacts of light pollution and take appropriate steps to avoid adverse impacts.

There is also a policy in the Environmental Protection Element that states that regulations for outdoor lighting should be maintained that reduce light pollution and conserve energy, with particular attention to glare and nighttime light trespass in the vicinity of the U.S. Naval Observatory.

Those provisions are consistent with the zoning code and policies, which guide the policy recommendations of the ANC as well. All the commercial properties in ANC3B along Wisconsin Avenue on both sides of the street, from Calvert Street south to Whitehaven Parkway on the west side and Whitehaven Street on the east side (also including 3300 Whitehaven Street and 2001 Wisconsin) are in the MU-27 zone, identified as the Naval Observatory Mixed Use Zone.

The zoning code for MU-27 (§11-G800) states the purposes of the zone “promote the public health, safety, and general welfare on land adjacent to or in close proximity to the highly sensitive and historically important United States Naval Observatory, in keeping with the goals and policies of the Comprehensive Plan” and the master plan for the U.S. Naval Observatory. The MU-27 zone is also intended to “reduce or eliminate any possible harm or restrictions on the mission of the Federal establishment within the zone” and “to provide additional controls on private land to protect recognized federal interests including the critical scientific mission performed at the Naval Observatory and the security needs of the Vice President’s residence located on the grounds.” DC Code 11-G803 also specifies a 40-foot height limit in MU-27, to meet the purposes of the Naval Observatory Zone. See attached.

The ANC supports the purposes of the MU-27 zone, and will continue to work to ensure that the zoning requirements are met, as reinforced by the Comp Plan, and the Naval Observatory grounds and mission can be maintained. Many of the structures on nearby properties in the Glover Park commercial area are not currently built to the floor area or 40-foot maximum allowable height limits. Some new development is being added that will include additional stories for residential or in some cases commercial use above first floor retail space. All proposals in the commercial area that go through zoning review must meet the specific requirements and purposes of the MU-27 zone.

¶2309.9 *Policy RCW-1.2.8: Schools and Libraries* calls for expansion, renovation and improvement of area schools, which is an important priority for our ANC, as our local public elementary school is among the most crowded in the city. One of the proposed amendments removes a clause that alluded to the importance of considering schools “operating at or above capacity . . . in the approval of any residential development that could exacerbate school overcrowding.” With such severe overcrowding in area schools already, and which is getting worse year to year we also would also call for any development of additional housing to accommodate families to be planned in coordination with plans for adding capacity at DC public schools.

¶2309.12 *Action RCW-1.2.A: Combined Sewer Separation* calls for the city to “continue efforts to separate storm sewers and sanitary sewers within the area’s stream valleys, with a priority on **rehabilitating** the combined sewer in Glover Archbold Park.”

The ANC is pleased to see the mention of rehabilitating the sewer in Glover Archbold Park, which the community has been discussing with DC Water since 2013 and we are anticipating that in the next few years DC Water and the National Park Service will release a draft environmental assessment and circulate it for public review and comment. We believe, however, that the action statement as written may be misleading and partly incorrect. First, to the best of our knowledge, the rehabilitation of the sewer pipe in the stream valley in Glover Archbold Park does not involve separating storm sewers and sanitary sewers, and should not be included in a sentence about that effort. Second, we understand that the city is not pursuing separation of combined sanitary and stormwater systems right now except in two limited locations where combined sewers spill into the Potomac River in Georgetown south of the C&O Canal (CSO 25 and CSO 26). See: <https://www.dewater.com/whats-going-on/news/dc-water-begins-sewer-investigations-georgetown-sewer-separation> In 2005, DC Water entered a Consent Decree with the federal government to reduce Combined Sewer Outflows in the District, and there were some small sewer separations including in ANC3B at that time, which have been completed. There are no plans to pursue additional separation of combined sewer systems.

Under the Consent Decree, DC Water is installing “green infrastructure” in the part of western Glover Park to reduce stormwater run-off. This is the first year and the results will be evaluated by DC Water and U.S. Environmental Protection Agency, at which time DC Water will determine whether to pursue additional green infrastructure or build a tunnel to hold overflow from the Combined Sewer Systems after heavy storms to keep sewage out of the rivers. DC Water is now in the middle of the \$2.6 billion Clean Rivers Project initiated under the 2005 Consent Decree to build a series of other large tunnels under the

shorelines of the Anacostia and Potomac Rivers to hold the outflow from combined storm and sanitary sewers in the District, before the material goes to treatment at the Blue Plains wastewater treatment plant. The cost of the Impervious Area Charges to cover the costs of the Clean Rivers Project currently makes up more than 50% of most DC Water customers' monthly bills, and the bills are expected to continue reflecting these costs through the scheduled completion of the project in 2030 or beyond. The tunnels are planned to last for many more decades. In 2015, DC water requested and was granted a modification to the Consent Decree to allow use of green infrastructure in Glover Park and Georgetown to reduce stormwater run-off, instead of building an additional tunnel along the waterfront in Georgetown. But again, DC Water has not raised the prospect of a wide-scale project to replace combined sewers in our area. OP should contact DC Water if additional clarification is needed. We recommend the following:

PROPOSED NEW WORDING: ¶2309.12 Action RCW-1.2.A: Improvements to Combined Sewer Systems Complete current efforts to separate storm sewers and sanitary sewers. Place a priority on **rehabilitating** the combined sewer in Glover Archbold Park.

¶2309.15 Action RCW-1.2.D: Senior Wellness Center Development calls for the city to “develop a wellness center in the Rock Creek West Planning Area, partnering with existing facilities that serve all ages and community groups to provide decentralized programming, activities, and services to the area’s large population of older adults.” Our ANC pays close attention to interests and issues of seniors in the area, and for several years we have participated in discussions with seniors and providers of senior services about proposals for improving wellness services for area seniors. Wards 2 and 3 do not have a fixed facility designated as a Senior Wellness Center and the city has asked about establishing a single wellness center for the area, but many of our constituents do not support having a single fixed base senior for that purpose. Because the area west of Rock Creek is so large and senior adults reside in every neighborhood from Palisades and Georgetown to Chevy Chase, the distance from any one location in Rock Creek West to a fixed senior wellness center in another part of the area could be as much as 6 miles. That is a considerable distance for seniors to have to go for a daily or weekly activity. To be most effective at drawing seniors and meeting their needs, activities much closer to their home would be much more convenient and practicable. For that reason, our ANC strongly supports the current pilot program sponsored by the city to develop “satellite” wellness centers at multiple locations around the Rock Creek West area.

We appreciate the addition of a new clause in this action item about using “existing facilities that serve all ages and community groups to provide decentralized programming, activities, and services to the area’s large population of older adults,” With that amendment, however, the paragraph seems ambiguous about whether it is recommending: a senior center at some fixed location in the Rock Creek West area or more of a “virtual” center offering services at many different locations in Rock Creek West coordinated across the area but not an actual fixed senior wellness “center.”

This has been a subject of dialogue and coordination among residents, ANCs and Councilmember Mary Cheh, as well as Iona Senior Services as the designated provider for senior services in Ward 3, and the DC Office on Aging (now the Department of Aging and Community Living). The Council has provided funding for the pilot efforts to create a satellite wellness center for Wards 2 and 3. We would recommend that the provision be amended to reflect those facts:

PROPOSED NEW WORDING: ¶2309.15 Action RCW-1.2.D: Senior Wellness Services Develop and support **a strong senior wellness program** in the Rock Creek West Planning Area using existing facilities in the community to provide decentralized programming, activities, and services to the area’s large population of older adults.

**COMMENTS FROM ANN LANE MLADINOV ON
DRAFT AMENDMENTS TO THE DC COMPREHENSIVE PLAN (“COMP PLAN”)
FEBRUARY 14, 2020**

I have been the member of my Advisory Neighborhood Commission (ANC3B serving Glover Park-Cathedral Heights) who monitored and participated in the current amendment cycle for the Comp Plan. My ANC has adopted an official letter to OP with comments and recommendations related to the draft amendments to the Comp Plan, dated December 12 2019, and also February 13, 2020).

I was trained in City and Regional Planning, and I admire very much the planners who work with the community and ANCs on developing Comprehensive Plans and other plans for the District. You are trained and devoted professionals who care about your work and about the city you serve. That is evident each time I have a chance to call or meet or participate in a meeting with members of the Office of Planning (OP). I do not envy you the assignment to work on this amendment cycle of the DC Comprehensive Plan (“Comp Plan”) as it is a huge task to be responsible even tangentially in shaping a comprehensive plan for any city. The document is lengthy and complex, and each part is connected with many different elements as well as many different policies and programs and laws and regulations across the government and beyond. You also have the daunting challenge of working within a process that top executive officials would not allow to follow the generally prescribed or required course for a process to change the Comp Plan as significantly as is being proposed in this amendment cycle.

As my ANC and I have expressed several times to OP during the past few years of the current amendment cycle, it is frustrating and regrettable that the process for developing and putting forward such numerous and significant changes in the Comp Plan have not included:

- Evaluation of what is working well or not so well--strengths, weaknesses, opportunities, challenges. Performance measures. Data. Surveys, interviews, analysis at a deep level. And public outreach.
- Extensive outreach including public forums and conversations with individuals and groups around each part of the city about the changes they have been observing in their community, the physical character, demographic and social and economic conditions, infrastructure, housing and development patterns, including what they welcome or fear, like or dislike, promote or question.
- Concerted efforts to reach and elicit comments from the broadest possible number of residents and other stakeholders about their “vision” and priorities for the city, particularly related to the physical design, appearance, and plans for the future.
- Full opportunities for the public to review and comment on proposed drafts of any update or rewrite some or all of the Comp Plan, including suggested amendments and suggested items to retain, before proposed changes to any part of the Comp Plan are forwarded to the Council for review and approval.

Of course, to gather the people’s observations across such a comprehensive range of topics and areas would have required a comprehensive outreach effort. To assess how the city is doing in all the elements of “vision” and priorities to serve as the foundation for a comprehensive document of this magnitude would require a comprehensive evaluation, with a wide involvement across disciplines, stakeholder groups, and geographic areas, at many levels. To understand what such a large and complex collection of proposed amendments should mean in a “comprehensive” document would have required

a “comprehensive” analysis. And to communicate what the goals and objectives and likely on-the-ground effects of the proposed changes would be to people around the city would have required a comprehensive education effort. Was any of that done? No.

When the number of proposed amendments to the Comp Plan exceeded the number submitted in the previous amendment cycle—presumably, at some point, by a magnitude sufficient to call it “exponential”—should have set off a blinking “caution” light for somebody. Multiple ANCs/Commissioners and other parties called for a pause at the very start of the Open Call for Amendments, so OP, other planners working for city agencies, and members of the public could assess what was actually going well or not going as well under the existing Comp Plan. That was not done. I heard little if any disagreement about making updates to reflect new zoning provisions, other laws and regulations, Small Area Plans and other plans that city agencies had developed since the 2011 amendment cycle. However, multiple ANCs/Commissioners and other parties asked for (and were promised) a chance to get a full set of the proposed amendments that OP received, with indications of who submitted them and what they were intended to do, as a foundation for participating in the required public review and public comment period before any amendments went to the Council. That was not done either. I asked if there could be outreach to the public to ask ANCs and other stakeholders to note what they liked and wanted to see maintained in the Comp Plan, instead of asking only for suggestions of things that stakeholders would like to change.

The Open Call was open but it was only open for proposed amendments. It was not a call for comments or data that could be used for evaluation of what should be changed and what should be retained in the Comp Plan. It does not take any deep insight to appreciate that calling for suggested amendments is overtly biased toward change and those who want to see change. OP staff said they would be willing to take comments about what our ANCs would like to keep in the Comp Plan, but the online forum was geared to submitting amendments to each specific provision, not to getting other types of comments. All these suggestions seem like logical and valuable parts of an open and honest process to update or rewrite the Comp Plan, as the proposed amendments would do.

Did the drivers of the Comp Plan slow down the process? At every point when a red flag was waved and the city could have paused to try to redress some of the deficiencies in the process, there was virtual silence from top officials responsible for setting the calendar for the amendment cycle. At a briefing for ANC Commissioners in mid-2017, OP did commit to share a file with every amendment that was submitted, coded to indicate where it came from, what it might change, and which ANCs it would affect. Was that done? No need to answer. The promise was never really credible, but it suggested a welcome interest on OP’s part to sharing information and wanting to be transparent and helpful in working with ANCs and communities. The commitments seemed sincere when they were stated but the staff had an overwhelming number of proposed amendments to deal with and the promise could not be fulfilled.

With 3,000 amendments scattered throughout the document, and linked across multiple elements, it would take months of full-time work to figure out all the possible provisions that might be affected, and all the possible sites or locations. Nobody really knows that still. And because many of the amendments were proposed as part of a set of proposals designed to work together to achieve particular goals—which were never clearly articulated in any official or public documents—trying to identify the effects of any one in isolation would likely be very partial at best, and more likely actually misleading. Again, comprehensive presentations of the contents of the amendments

The Comp Plan headed onto a different track. Most observers didn't realize the commitments to share the proposed amendments and open them up to public review and comments had been dropped. The process rolled on without meeting that requirement and the next thing we knew, the 60+ page draft amended Framework Element was sent directly to the Council for review and hearings. Then alarms sounded, and hundreds of people registered their unhappiness, testifying to the Council until several hours after midnight in March 2018. The result was widespread frustration, distrust, anger, and suspicion of OP and the process. At that point, the brakes went on. The Council took on the responsibility of weighing all the interests and comments and coming up with a rewrite of the Framework Element.

Fifteen months went by, while OP continued to work on going through the rest of the Comp Plans to ensure that a complete mark-up of all the pages (1,500 in all) would be available for review and comment once the Council adopted the first 60+ page framework. In July 2019, the Council shared a new draft Framework Element, gave it a first reading in July 2019, and approved it on October 8, 2019. On October 15, 2019, OP shared the full red-line version of its draft amended Comp Plan, edited to comport with the amendments adopted in the Framework Element the week before. The due date was set for December 20 for the general public, January 31 for ANCs, and in a gracious move, OP Director Andrew Trueblood agreed to give "great weight" to ANCs comments. That was a significant change from previous announcements, because the DC Office of Attorney General had reviewed provisions of DC Code and said that "great weight" does not extend to ANC comments on plans such as the Comp Plan, on the basis that the executive agency does not make the "final decision," the Council makes the final decision. In response to repeated calls for additional time to submit comments, the Mayor did announce a 3-week extension of the comment period for the general public, until January 10, and a 2-week extension for ANC comments, until February 14.

Extensive public outreach, full sharing of information, efforts to educate the public so they would understand what proposed changes would mean if they were implemented—These were unfortunately never done. When I spoke at the ANC briefing in May 2019 about the deficiencies in the process to date, I said after the discussions that I wished we all could start the process over and do it right, and the host of the event said if he had the option, he would probably do that. But we had to move forward.

On May 14, 2019, we received a press release:

Over the past three years, Mayor Bowser and the DC Office of Planning (OP) have collected community input to understand what residents care about most as the District continues to thrive, grow, and prosper. Eight DC values – accessibility, diversity, equity, livability, opportunity, prosperity, resilience, and safety – aim to express the essence of what makes DC home for a diverse, inclusive community. Feedback on these values will help guide OP through the remainder of the Comprehensive Plan (Comp Plan) Amendment process. . . . OP has launched a new [DC2ME](#) campaign featuring the values and a community survey.”

The Values campaign was open to the public participate by online survey, indicating in order how much they cared about the 8 “values,” in order of importance. The scores were reported, for the city as a whole and for each ward, in a glossy publication that was inserted in the packets at events organized to promote OP’s draft amended Comp Plan. The report, optimistically titled, “Our Shared DC Values: Re-engaging the Public in the District of Columbia Comprehensive Plan Amendment Process,” was issued on September 30, 2019. Of the city’s population of over 700,000 people, a total of 3,097 people (less than ½ of one percent) participated in the Values campaign, 2,494 of them online and 603 in person. The

numbers of participants ranged from 206 in Ward 8 to 523 in Ward 6—clearly neither a large share nor any kind of representative sample of the people of the District.

The report said the Values effort was “an important step to re-engage with the public and provide a bridge between Open Call and the release of the remaining chapters of the Draft Comp Plan, anticipated for Fall of 2019. “Livability, Safety, and Equity got the largest number of “votes” city-wide, so they were described as the most important for the amended Comp Plan to emphasize.

OP’s press release announced, “As we work hard to produce an amended Comp Plan that represents all DC residents, we are excited [to] find that the most important concepts in the Comp Plan align with the values most important to residents.” But what really did it represent, either to a member of the public or to the Office of Planning? Your values are the values you try to live by--all of them, not a few that you pick and choose because you like them the best. They are the foundation stones of your behavior and decisions. This is another illustration of the failure of the Comp Plan amendment cycle to accomplish what the process should have been aiming to do if the intention was truly to develop a new vision for the city. To be “our vision,” a plan needs to represent the actual voices and interests and priorities of the people, which were never sought in the entire 3-year process.

I am sympathetic with the call by the Committee of 100 to set aside the results of this amendment cycle and try again for a better process for the full rewrite of the Comp Plan, due in 2026. (See the recommendations in the ANC3B letter to OP of February 13, 2020.)

The process did not meet the legal requirements for a Comp Plan update, or the professional expectations for developing a comprehensive plan for one of the most important and most visible cities in the United States. For planners, a comprehensive plan is the essential guidebook and platform for all other planning. For residents, the comprehensive plan should express our priorities and our hopes, and support and protect our interests as the most fundamental part of the life of the place that is our home.

This is a plea to OP, to our elected leaders in the executive and the Council, to do your best to listen to the voices of the people of the District in the next steps of this cycle of the Comp Plan process and whatever the result, resolve to do a more responsible and inclusive and equitable job in the round of planning we will soon begin, in order to formulate a full rewrite of the DC Comprehensive Plan to guide the city for the next two decades. We can do better and we must do better, if we are going to be a truly inclusive city in the way we plan and the way we live.